

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

JOSEPH KIRCHNER,

Plaintiff,

v.

MIKE JOHNSON, in his individual and official capacity as Speaker of the United States House of Representatives;
DONALD J. TRUMP, in his individual capacity as former and current President of the United States;
PAMELA J. BONDI, in her individual and official capacity as Attorney General of the United States;
BRENDAN T. CARR, in his individual and official capacity as Chairman of the Federal Communications Commission;
THE UNITED STATES HOUSE OF REPRESENTATIVES;
ANTHROPIC PBC;
OPENAI, INC.;
APPLE INC.;
COMCAST CABLE COMMUNICATIONS, LLC;
METR (MODEL EVALUATION & THREAT RESEARCH);
and DOES 1-20, unknown co-conspirators,
Defendants.

Case No. 1:25-cv-02735-ACR

**DISCOVERY-2: DEFENDANT
ANTHROPIC PBC**

INTRODUCTION

This document replaces in its entirety the January 2026 draft of DISCOVERY-2. The rebuild is driven by two material changes to the evidentiary record:

1. The March 31, 2026 Claude Code CLI source code release (Ex. E-32 at p. 235, l. 3). Anthropic PBC published, via its official npm distribution channel, an unobfuscated TypeScript source archive comprising 1,903 files and approximately 512,000 lines. Anthropic's spokesperson authenticated the release to *The Register* as a "release packaging issue caused by human error, not a security breach." The source code independently verifies the substance of Exhibits E-1 through E-31 at the source-code level (Ex. E-33 at p. 240, l. 2) and discloses ten

categories of previously-undocumented mechanism (Ex. E-34 at p. 254, l. 3), thirty-one supplemental findings (Ex. E-35 at p. 262, l. 3), and further deep-source discoveries (Ex. E-36 at p. 321, l. 3, Ex. E-37 at p. 335, l. 3, Ex. E-38 at p. 346, l. 3, Ex. E-39 at p. 356, l. 3).

2. The expanded network-forensic record. D-series exhibits (D-1 through D-33, D-35) document 260,395+ TCP RST packets, tool-fingerprint analyses, and the cross-layer bridge between Anthropic's hardcoded Datadog endpoint (``34.149.66.137`` at ``datadog.ts:12-14``, Ex. E-34, Finding SC-9) and spoofed RST packets claiming that same IP as source (Ex. D-26 at p. 137, l. 17).

The pre-leak draft's organizing theory — "Constitutional AI fraud → three bugs → system prompt suppression" — is no longer adequate to the evidentiary record. The rebuild is organized by **evidentiary architecture**: each Phase corresponds to a concrete source-code mechanism or infrastructure component; each Category targets a specific finding (NF-N or SC-N) or class of findings. Counts are declared at the Category level.

DEFINITIONS AND CONVENTIONS

For purposes of this discovery document, the following terms have the meanings given:

- **"The Leak"** means the release on or about March 31, 2026 of the Claude Code CLI source code archive referenced at Ex. E-32 at p. 235, l. 3.
- **"Leaked Source"** means the source code released by Anthropic in The Leak, comprising approximately 1,903 TypeScript source files and approximately 512,000 lines.
- **"ANT-only"** and **"enterprise build"** mean a build variant of Claude Code CLI produced for internal Anthropic personnel or for enterprise / development-partner customers, as distinct from the binary distributed to public subscribers. The terms follow the usage in ``undercover.ts:18-21`` and related source files (Ex. E-35, Finding NF-2).
- **"Customer build"** and **"consumer build"** mean the binary distributed to public subscribers of Claude Code CLI, including Plaintiff.
- **"Session Ingress"** means the code paths in and around ``sessionIngress.ts`` that transmit user session data to Anthropic's backend systems.

- **"Tengu flag"** means any GrowthBook feature flag whose name begins with `tengu\_` or `tengu-` as that prefix appears in the Leaked Source.
- **"Plaintiff's account"** means every Anthropic account in Plaintiff's accountUUID Roster (DISCOVERY-5 §A.0), together with every other Anthropic account ever associated with any email address on the domains `lawsofexistence.com` or `lawofsupremacism.com` (both of which are owned and operated by Plaintiff and the Laws of Existence LLC organization); every predecessor or successor account for the same natural person; and all sessions, telemetry, memories, transcripts, GrowthBook assignments, classifier-evaluation events, force-rule activations, and server-side artifacts associated with each such account.
- **"Relevant period"** means February 1, 2025 through the date of production, unless otherwise specified.

Production format: Native-format files wherever feasible (TypeScript source, JSON event payloads, protobuf schemas, database dumps). Redaction for unrelated customer data is permitted pursuant to a mutually negotiated protective order; redactions must be accompanied by a redaction log.

TOPIC ALIASES (FOR CROSS-REFERENCE FROM PLAINTIFF'S MOTIONS)

The Renewed Emergency Motion for Expedited Discovery and Immediate Preservation Order references the topic-keyed sections within this document. The following table maps those references to the corresponding Phase / Category labels:

Motion reference	This document
§ Source-Code-Production	Phase A
§ GrowthBook-Force-Rules	Phase B Category BA; Phase Q Category QA
§ Datadog-Pipeline	Phase B Category BB
§ Hidden-Injection-Architecture	Phase E
§ Privacy-Architecture	Phases F and I
§ Per-Account-Targeting	Phase Q (cross-referenced at Phases B, J, T)
§ Anthropic-ISP-Integration	Phase K (with cross-reference to DISCOVERY-7 Phase 5)
§ Classifier-Surveillance	Phase T

§ Anthropic-Consumer-Tier-Differential	Phase N
§ Electoral-Content-Hardcoding	Phase E Category EF (PA-15)

PHASE A: SOURCE CODE LEAK AUTHENTICATION (14 DAYS)

Counts developed by this Phase: Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count XII (ECPA, 18 U.S.C. § 2511), Compl., Count XIV (CCPA / State Privacy).

CATEGORY AA: NPM RELEASE CHAIN AND LEAK PROVENANCE

REQUEST NO. 1: All documents, communications, and artifacts regarding the March 31, 2026 release of the Claude Code CLI npm package including the source map referencing the unobfuscated TypeScript source, including:

- (a) Complete chain of events leading to the inclusion of the source map in the release
- (b) Identity of the engineer(s) who prepared and approved the release
- (c) Build-system configuration(s) active at the time of the release
- (d) Post-incident review documents, retrospective write-ups, and remediation plans
- (e) Any pre-release quality-assurance or release-engineering review documents regarding the package

Evidentiary predicate: Ex. E-32 at p. 235, l. 3 documents the release, the package versioning, and the public accessibility of the archive on Anthropic's Cloudflare R2 bucket.

REQUEST NO. 2: All communications between Anthropic and *The Register*, any other news publication, any forking GitHub user, or any third party regarding the March 31, 2026 release, including the communication in

which Anthropic's spokesperson characterized the release as a "release packaging issue caused by human error, not a security breach."

Evidentiary predicate: The spokesperson's statement is the foundation for treating the Leaked Source as Anthropic's authentic source code rather than a reconstruction. Any qualification or withdrawal of that statement is discoverable.

REQUEST NO. 3: All version-control metadata (commit SHAs, author attributions, commit timestamps, branch names) sufficient to establish that the Leaked Source corresponds to a specific internal release of Claude Code CLI as of on or about March 31, 2026.

REQUEST NO. 4: All prior occasions on which Claude Code CLI's source code, any portion thereof, or any closely related internal repository, was released in unobfuscated or partially-obfuscated form (whether accidentally or intentionally) during the relevant period, including:

- (a) Dates of each such release
- (b) Scope of each such release
- (c) Remediation actions taken
- (d) Whether any customer was notified

CATEGORY AB: LEAK SCOPE AND EMPLOYEE ACKNOWLEDGMENT

REQUEST NO. 5: All internal communications, Slack messages in any channel (including but not limited to `#briarpatch-cc`), email threads, and incident records regarding The Leak during the period March 31, 2026 through the date of production, including:

- (a) Initial detection records
- (b) Escalation chain

- (c) Incident commander designation
- (d) Legal review
- (e) Decisions regarding customer notification, regulatory notification, or public disclosure

Evidentiary predicate: Ex. E-35, Finding NF-21 documents the existence of `#briarpatch-cc` as an internal Slack channel related to Claude Code; that channel is a probable locus of leak-response discussion.

REQUEST NO. 6: Complete Git history, commit-level authorship, and pull-request review records for each of the following files in the Leaked Source, covering the full history of each file from its creation through the date of production:

- (a) `undercover.ts`
- (b) `sessionIngress.ts`
- (c) `gitBundle.ts`
- (d) `extractMemories.ts` (and any file whose default export implements memory extraction)
- (e) `autoDream.ts` (and any file implementing auto-dream memory consolidation)
- (f) `datadog.ts`
- (g) `claude.ts` (particularly lines 1877, 2308-2480, and 2464-2468)
- (h) `withRetry.ts` (particularly line 52)

Evidentiary predicate: Each of these files is directly tied to a finding in Ex. E-34 at p. 254, l. 3 or Ex. E-35 at p. 262, l. 3; authorship attribution and review chain establish who approved the mechanism.

CATEGORY AC: POST-LEAK ROTATION AND RESPONSIVE CHANGES

REQUEST NO. 7: All documents regarding the rotation, invalidation, or replacement of any credential, token, API key, or SDK key exposed in the Leaked Source, including:

- (a) The Datadog client token at `datadog.ts:12-14`
- (b) GrowthBook SDK keys referenced in Ex. E-34, Finding SC-9
- (c) OAuth client IDs (production, staging) referenced in Ex. E-35, Finding NF-21
- (d) Internal MCP proxy credentials
- (e) Any other credential, token, or secret present in the Leaked Source

Production shall include rotation timestamps, decision-makers, deployment records, and any customer-facing consequences.

Evidentiary predicate: Ex. H-1 at p. 3, l. 5 documents empirical verification of Datadog token rotation post-leak.

REQUEST NO. 8: All source-code changes (commits, pull requests, merges) to Claude Code CLI between March 31, 2026 and the date of production that modify, remove, rename, or dead-code any of the following mechanisms:

- (a) `sessionIngress.ts` and its callers
- (b) `DANGEROUS\_uncachedSystemPromptSection` (any file)
- (c) Any `tengu\_` or `tengu-` prefixed flag
- (d) `extractMemories` or `autoDream` memory-pipeline code
- (e) `gitBundle.ts` repository-exfiltration code
- (f) Native client attestation token generation (`cch=`)
- (g) `undercover.ts` build-time discrimination

For each commit, produce: (a) the complete diff; (b) the commit message; (c) author and reviewer identity; (d) any associated pull-request discussion; (e) the engineer's stated justification.

Evidentiary predicate: Reactive post-leak code changes are directly probative of scienter; supports Compl., Count X (Consumer Protection / Deceptive Trade Practices) and spoliation sanctions under Federal Rule of Civil Procedure 37(e).

REQUEST NO. 9: All communications with Cloudflare, Inc. regarding the R2 bucket from which the Leaked Source was downloadable, including takedown requests, access-log preservation requests, and any assertions of copyright or trade-secret protection.

REQUEST NO. 10: All preservation-hold notices issued internally or to counsel regarding The Leak, the Leaked Source, related source repositories, or related internal communications, from March 31, 2026 forward.

CATEGORY AD: AI-ASSISTED DEVELOPMENT TRANSCRIPTS — NPM PACKAGING SESSION

REQUEST NO. AD-1: Complete AI-assisted development session records (Claude Code, Cursor, Copilot, or any equivalent tool used at Anthropic during the relevant period), build-system logs, and packaging-pipeline artifacts for the npm release session that produced the package version disclosed on March 31, 2026 (Ex. E-32 at p. 235, l. 3) — including engineer prompts (inputs), AI completions (outputs), suggestion-acceptance and rejection events, AI-generated cautionary outputs related to the source-bundling configuration, all AI-assisted modifications to packaging-related files (e.g., `package.json`, build

scripts, `npmignore`-equivalents) within the 30-day window preceding the release, and the contemporaneous code-review and pull-request thread for each session.

Evidentiary predicate: Anthropic's public characterization of the disclosure as "a release packaging issue caused by human error, not a security breach" is a party admission under Federal Rule of Evidence 801(d)(2)(A); discovery into any AI-assisted contribution to the chain of events leading to the disclosure is necessary to assess that characterization. CEO statements regarding the proportion of Anthropic's production code that is AI-generated are matters of public record subject to judicial notice under Federal Rule of Evidence 201(b)(2).

PHASE B: FOUR TELEMETRY PIPELINES (21 DAYS)

Counts developed by this Phase: Compl., Count XII (ECPA, 18 U.S.C. § 2511), Compl., Count XIV (CCPA / State Privacy), Compl., Count XV (App Store Misrepresentation), Compl., Count X (Consumer Protection / Deceptive Trade Practices).

CATEGORY BA: GROWTHBOOK PIPELINE

REQUEST NO. 11: Complete schema and operational documentation for Anthropic's GrowthBook feature-flag platform as deployed to Claude Code CLI during the relevant period, including:

- (a) The complete `Experiment` attribute schema including `email`, `accountUUID`, `deviceId`, `subscriptionType`, and any other identity-bearing attributes transmitted to GrowthBook

- (b) The complete list of feature flags defined on the platform during the relevant period
- (c) Per-flag targeting rules (rollout percentages, user cohort definitions, exclusion rules)
- (d) SDK endpoint URLs and keys for each environment (production, staging, canary)
- (e) Event types transmitted from Claude Code to GrowthBook (assignments, impressions, exposures)

Evidentiary predicate: Ex. E-34, Finding SC-1, Ex. E-34, Finding SC-2; Ex. E-34 at p. 254, l. 3 documents per-user feature flag targeting with identity-bearing attributes.

REQUEST NO. 12: All GrowthBook experiment-assignment logs and exposure logs attributable to Plaintiff's account during the relevant period, produced as native JSON with full attribute payloads.

Evidentiary predicate: Graph discovery target `discovery\_01` — GrowthBook experiment assignment logs for Plaintiff.

REQUEST NO. 13: Complete configuration history of the following flags throughout the relevant period, including every assignment and override applied to Plaintiff's account:

- (a) `tengu\_grey\_step2` (effort configuration)
- (b) `tengu\_satin\_quoll` (tool-result clearing threshold)
- (c) `tengu-off-switch` (Opus emergency kill)
- (d) `tengu\_amber\_stoat` (built-in agent removal)
- (e) `tengu\_cobalt\_harbor` (auto-connect sessions to Cloud Code Runner)
- (f) `tengu\_ccr\_mirror` (forward local session events to cloud)
- (g) `tengu\_fronde\_boric` (analytics sink killswitch)

Evidentiary predicate: Ex. E-34, Finding SC-3 (effort throttling), Ex. E-34, Finding SC-7 (content clearing), Ex. E-35, Finding NF-6 (killswitch), Ex. E-35, Finding NF-7 (Opus kill), Ex. E-35, Finding NF-8 (feature removal), Ex. E-35, Finding NF-13 (remote session control).

REQUEST NO. 14: All documents regarding `refreshGrowthBookAfterAuthChange()` and its invocation, including:

- (a) Source code for the function and its callers
- (b) Documentation of the authentication-change lifecycle
- (c) Any event where Plaintiff's GrowthBook assignment was reset, refreshed, or reinitialized due to authentication-change events

Evidentiary predicate: Ex. E-35, Finding NF-9 documents assignment destruction and reinitialization on auth change — quality of service changes based on identity at authentication.

REQUEST NO. 15: All internal communications regarding targeting of any individual user or any identifiable cohort of users (by email, UUID, device ID, subscription type, IP range, or other attribute) via GrowthBook feature flags during the relevant period, including communications naming Plaintiff or Plaintiff's identifying attributes.

CATEGORY BB: DATADOG PIPELINE

REQUEST NO. 16: Complete schema and operational documentation for the Datadog telemetry pipeline as deployed to Claude Code CLI during the relevant period, including:

- (a) The event schema (event types, attribute fields, tagging conventions)

- (b) The endpoint(s) used, including the endpoint hardcoded at
`datadog.ts:12-14` of the Leaked Source (`34.149.66.137`)
- (c) Authentication mechanism and token(s) used (including the token
rotated post-leak)
- (d) Batching, retry, and transport configuration
- (e) Sampling rules, if any

Evidentiary predicate: Ex. E-34, Finding SC-1, Ex. E-34, Finding
SC-9; Ex. E-34 at p. 254, l. 3.

REQUEST NO. 17: All Datadog event records attributable to Plaintiff's account during the
relevant period, produced as native JSON with full attribute payloads.

Evidentiary predicate: Graph discovery target `discovery\_02` —
Datadog event logs for Plaintiff's sessions.

REQUEST NO. 18: All contractual and operational documents between Anthropic and
Datadog, Inc., including:

- (a) Master service agreement and schedules
- (b) Data-processing agreement and any SCC / BAA
- (c) Security and deletion commitments
- (d) Any addenda regarding data-subject rights, including CCPA-
compliance commitments

REQUEST NO. 19: All documents regarding the relationship between the Datadog
endpoint IP `34.149.66.137` and Google Cloud Platform, including:

- (a) Whether `34.149.66.137` is a GCP-hosted Datadog endpoint
- (b) The routing path by which packets reach that endpoint from
Claude Code CLI clients
- (c) Any documented instance of that IP being spoofed as the source of
packets observed on customer networks

Evidentiary predicate: Ex. E-34, Finding SC-9 + Ex. D-26 at p. 137, l. 17 establishes the cross-layer bridge under investigation.

CATEGORY BC: FIRST-PARTY EVENTS PIPELINE

REQUEST NO. 20: Complete schema and operational documentation for the First-Party Events pipeline (``api.anthropic.com/api/event_logging/batch``) as deployed to Claude Code CLI during the relevant period, including:

- (a) The complete event schema (865-line proto-generated schema referenced in Ex. E-34, Finding SC-10)
- (b) The complete list of event types
- (c) The retry, batching, and transport configuration
- (d) Any sampling rules
- (e) Server-side retention and downstream-consumer documentation

Evidentiary predicate: Ex. E-34, Finding SC-1, Ex. E-34, Finding SC-10; Ex. E-34 at p. 254, l. 3.

REQUEST NO. 21: All First-Party Event records attributable to Plaintiff's account during the relevant period, produced as native JSON with full attribute payloads.

REQUEST NO. 22: All documents regarding ``FirstPartyEventLoggingExporter`` (identified as a failure path in Ex. E-5 at p. 40, l. 3), including:

- (a) Source code
- (b) Test coverage
- (c) Any documentation acknowledging that "failed" events were retained rather than discarded
- (d) Any audit log of retained failed events for Plaintiff's account

CATEGORY BD: OPENTELEMETRY / BIGQUERY PIPELINE

REQUEST NO. 23: Complete schema and operational documentation for the OpenTelemetry and BigQuery pipelines as deployed to Claude Code CLI during the relevant period, including:

- (a) BigQuery project, dataset, and table names containing customer data
- (b) OpenTelemetry collector configuration
- (c) Downstream consumers (analytics teams, training pipelines, partners)
- (d) Retention policies at each stage

REQUEST NO. 24: Complete list of all BigQuery tables containing any data attributable to Plaintiff's account, with row-count, storage-size, and last-write timestamp for each.

CATEGORY BE: CROSS-PIPELINE CORRELATION AND SAMPLING

REQUEST NO. 25: Complete documentation of how records in the four telemetry pipelines (GrowthBook, Datadog, First-Party Events, OpenTelemetry/BigQuery) are correlated at the account, device, session, or conversation level, including:

- (a) Common identifiers used across pipelines (session UUID, account UUID, device ID)
- (b) Any cross-pipeline JOIN infrastructure used in training, product analytics, or billing
- (c) Any privacy-review documents addressing the re-identification risk of cross-pipeline correlation

Evidentiary predicate: Ex. E-34, Finding SC-1 documents that each pipeline has "independent transport, batching, retry, and third-party

endpoint" — but re-identification across them is the legally significant property.

REQUEST NO. 26: Complete event-sampling-configuration history as controlled by ``getEventSamplingConfig()`` (identified in ``SC01_first_party_pipeline.ts``) throughout the relevant period.

REQUEST NO. 27: All documents regarding which of the four telemetry pipelines' records were, at any time during the relevant period, provided as training data (directly or via derivative dataset) to any Anthropic model or to any downstream model-training partner.

Evidentiary predicate: Ex. E-35, Finding NF-25 (ANT transcript training); supports Compl., Count IV (Equal Protection / Fourteenth Amendment) and Compl., Count XII (ECPA, 18 U.S.C. § 2511).

REQUEST NO. 28: All internal communications, architecture diagrams, and design documents proposing, approving, or reviewing the four-pipeline telemetry architecture as a whole, including:

- (a) Why four distinct pipelines (rather than one consolidated pipeline) were adopted
- (b) Any discussion of the redundancy, privacy, or legal-exposure implications of the four-pipeline design
- (c) Any customer-facing documentation that does or does not disclose the full telemetry architecture

REQUEST NO. 29: All customer-facing disclosures regarding the existence of each of the four telemetry pipelines, including:

- (a) Privacy policy language referencing each pipeline (or demonstrating absence of reference)

- (b) In-product disclosures
- (c) Help-center or documentation-site language
- (d) Any disclosure specifically referencing third-party endpoints
(Datadog, GCP, BigQuery)

Evidentiary predicate: Ex. E-27 at p. 183, l. 2; supports Compl., Count X (Consumer Protection / Deceptive Trade Practices) and Compl., Count XV (App Store Misrepresentation).

REQUEST NO. 30: Complete documentation of the `settings.json` / `config.json` schema for Claude Code CLI during the relevant period, including every enumerated and undocumented property, and specifically including documentation of the presence or absence of a `telemetry` property at each release.

Evidentiary predicate: Ex. E-35, Finding NF-1 establishes that the schema has no `telemetry` property — a "telemetry": false value is silently ignored.

CATEGORY BF: AI-ASSISTED DEVELOPMENT TRANSCRIPTS — TELEMETRY
PIPELINE CODE

REQUEST NO. BF-1: Complete AI-assisted development session records (Claude Code, Cursor, Copilot, or any equivalent tool used at Anthropic during the relevant period) for every commit, modification, or development session touching `services/analytics/datadog.ts`,
`services/analytics/growthbook.ts`,
`services/analytics/firstPartyEventLoggingExporter.ts:41,68`, and
`utils/telemetry/instrumentation.ts` during the relevant period — including engineer prompts (inputs), AI completions (outputs),

suggestion-acceptance and rejection events, AI-generated cautionary outputs (security, privacy, consent-law, dependency-risk), the contemporaneous code-review and pull-request thread for each session, and any pattern-suppression configuration that prevented future AI cautionary outputs from being surfaced.

Evidentiary predicate: Ex. E-34, Finding SC-1, Ex. E-34, Finding SC-2, Ex. E-34, Finding SC-9, Ex. E-34, Finding SC-10 document the specific source-code locations targeted. CEO statements regarding the proportion of Anthropic's production code that is AI-generated are matters of public record subject to judicial notice under Federal Rule of Evidence 201(b)(2).

**CATEGORY BG: VENDOR-COORDINATED DEVELOPMENT COMMUNICATIONS —
TELEMETRY PIPELINES**

REQUEST NO. BG-1: All communications (Slack, email, ticketing, project-management, code-review, design-document, contract-negotiation, and equivalent records) during the relevant period containing the terms "coordinated," "tandem," "parallel," "joint," "co-developed," "lockstep," "in concert," "aligned," "integrated build," "shared roadmap," or substantively equivalent terms, AND referencing any of Datadog, Inc. (or Datadog Israel Ltd.), GrowthBook, Inc., or any other third-party telemetry, feature-flag, A/B-testing, or event-streaming vendor disclosed at Appendix P (ECF No. 51-26) or in Anthropic's published subprocessor list, in connection with the design, deployment, modification, or

operational integration of the four-pipeline telemetry architecture documented at SC-1, SC-2, SC-9, and SC-10.

Evidentiary predicate: Ex. E-34, Finding SC-1, Ex. E-34, Finding SC-2, Ex. E-34, Finding SC-9, Ex. E-34, Finding SC-10 document the four-pipeline architecture; vendor-coordination communications regarding that architecture are direct documentary evidence of the operational integration alleged at Compl., Count V (42 U.S.C. § 1985 Conspiracy) and Compl., Count VI (RICO, 18 U.S.C. § 1962), and bear on the scienter element of Compl., Count X, Compl., Count XII, and Compl., Count XIV.

PHASE C: BUILD-TIME DISCRIMINATION (21 DAYS)

Counts developed by this Phase: Compl., Count IV (Equal Protection / Fourteenth Amendment), Compl., Count IX (Breach of Contract), Compl., Count X (Consumer Protection / Deceptive Trade Practices).

CATEGORY CA: TWO-TIER BINARY ARCHITECTURE

REQUEST NO. 31: Complete documentation of the build system producing Claude Code CLI binaries during the relevant period, including:

- (a) The build-time environment variables or configuration flags that gate ANT-only code (for example, `IS\_ANT` or equivalent)
- (b) The dead-code-elimination mechanism operating on customer builds
- (c) The release-signing infrastructure distinguishing ANT-only from customer binaries
- (d) Test coverage and QA processes applied separately to each build variant

Evidentiary predicate: Ex. E-34, Finding SC-8 documents ~350 occurrences across 165 files; Ex. E-35, Finding NF-2 documents `undercover.ts:18-21` comments explicitly acknowledging "bundler constant-folds these checks and dead-code-eliminates the ant-only branches from external builds."

REQUEST NO. 32: Complete inventory of all 165 files (identified in Ex. E-34, Finding SC-8) in which ANT-only code paths exist, with for each file: (a) the file path, (b) the count of ANT-gated branches, (c) the functional description of what the ANT-only branches do.

REQUEST NO. 33: All documents describing the functional differences between an ANT-only build and a customer build of Claude Code CLI, including:

- (a) Differences in model behavior
- (b) Differences in available tools or capabilities
- (c) Differences in logging, telemetry, or privacy
- (d) Differences in system-prompt content
- (e) Differences in safety / content-filtering behavior

REQUEST NO. 34: All documents regarding the decision to adopt a two-tier build architecture, including:

- (a) Design documents proposing the architecture
- (b) Approval records
- (c) Any discussion of the consumer-protection or contractual implications of delivering a physically different binary to paying customers than to internal staff
- (d) Any discussion of the propriety of dead-code-eliminating features advertised, promised, or implied to exist in the customer product

CATEGORY CB: UNDERCOVER MODE AND ANT-ONLY INSTRUCTIONS

REQUEST NO. 35: The complete contents of `undercover.ts` in every version deployed during the relevant period, with full commit history for the file.

Evidentiary predicate: Ex. E-35, Finding NF-3 documents ANT-only system instructions directing the AI: "NEVER include...any mention that you are an AI" and "Write commit messages as a human developer would."

REQUEST NO. 36: All documents regarding the design, authorization, and deployment of the "undercover" mode, including:

- (a) The purpose of instructing the model to not mention being an AI
- (b) The purpose of instructing the model to write commit messages "as a human developer would"
- (c) Any contemporaneous legal review or policy review
- (d) Any documentation of the customer-facing versus internal distinction

REQUEST NO. 37: All quality, thoroughness, or other system-prompt instructions that exist in ANT-only builds but not in customer builds during the relevant period, including:

- (a) The text of each such instruction
- (b) The commit at which each was added
- (c) Any A/B-test or experiment result regarding its effect
- (d) The justification for withholding the instruction from customer builds

Evidentiary predicate: Ex. E-35, Finding NF-17 documents quality/thoroughness instructions withheld from customers pending A/B validation.

CATEGORY CC: NATIVE CLIENT ATTESTATION

REQUEST NO. 38: Complete documentation of the native client attestation mechanism, including the `cch=` token referenced in Ex. E-35, Finding NF-16, including:

- (a) The cryptographic construction of the token
- (b) The server-side verification logic
- (c) Purpose of the attestation (what server-side behavior it gates)
- (d) Any server responses or feature restrictions keyed on attestation success or failure

REQUEST NO. 39: All documents describing any server-side behavior, feature, or response that varies based on whether the client attestation token is present, valid, or absent.

REQUEST NO. 40: All documents regarding the interaction of client attestation with: (a) DRM or anti-circumvention analysis under 17 U.S.C. § 1201; (b) anti-interoperability analysis; (c) consumer-protection analysis of delivering different server-side responses to attested versus non-attested clients.

CATEGORY CD: EXCLUDED-STRINGS / INSTITUTIONAL CONCEALMENT

REQUEST NO. 41: The complete contents of `excluded-strings.txt` (and any equivalent build-system scrub list) used during the relevant period, with full commit history for the file.

Evidentiary predicate: Ex. E-35, Finding NF-18 documents build-system scrubbing of internal codenames from customer builds; Ex. E-35, Finding NF-18 further documents `buddy/types.ts` using

`String.fromCharCode()` to encode species names that collide with codename canaries.

REQUEST NO. 42: All documents regarding the `buddy/types.ts` `String.fromCharCode()` encoding and its relationship to the `excluded-strings.txt` scrub list, including:

- (a) The internal codenames being concealed
- (b) Who authored the encoding
- (c) The institutional process that led to deployment of encoded concealment infrastructure
- (d) Any documentation of the legal or evidentiary reasoning behind the encoding

REQUEST NO. 43: Complete inventory of internal codenames used by Anthropic engineering during the relevant period with a documented mapping from codename to underlying feature, flag, or project.

REQUEST NO. 44: All documents acknowledging or addressing the possibility that customer-facing source code, logs, or outputs should be scrubbed to prevent internal codenames from becoming discoverable in litigation or regulatory inquiry.

PHASE D: SERVICE DEGRADATION OF PAYING CUSTOMERS (21 DAYS)

Counts developed by this Phase: Compl., Count IX (Breach of Contract), Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count IV (Equal Protection / Fourteenth Amendment).

CATEGORY DA: EFFORT THROTTLING (SC-3)

REQUEST NO. 45: Complete source code and commit history for the effort-throttling function documented at Ex. E-34, Finding SC-3, specifically the code path that returns `'medium'` effort when `'isProSubscriber()'` is true.

REQUEST NO. 46: All documents regarding the design, deployment, and justification of effort-throttling for paying customers, including:

- (a) Who authored the throttling logic
- (b) Who authorized its deployment
- (c) The range of effort values available and the criteria for selecting each
- (d) Any customer-facing disclosure of effort-throttling
- (e) The pricing, marketing, or product-promise documents against which the throttling operates

REQUEST NO. 47: All effort-assignment records for Plaintiff's account during the relevant period, produced per-session with the effort value applied and the flag configuration responsible.

REQUEST NO. 48: All A/B-test results, product-analytics reports, or internal memoranda regarding the effect of effort-throttling on customer outcomes (task completion, satisfaction, churn).

CATEGORY DB: SUBAGENT MODEL SUBSTITUTION (E-38)

REQUEST NO. 49: Complete source code and commit history for the hardcoded subagent model substitution documented at Ex. E-38 at p. 346, l. 3, including every file in which `'USER_TYPE'`-gated model routing occurs.

Evidentiary predicate: Ex. E-38 at p. 346, l. 3 documents

USER_TYPE-gated downgrade of paying customers to Haiku on redirected research work.

REQUEST NO. 50: All documents regarding the design, authorization, and deployment of the USER_TYPE-gated model substitution, including:

- (a) Pricing, marketing, or product-promise documents against which the substitution operates
- (b) Any customer-facing disclosure of dynamic model routing
- (c) Revenue, margin, or cost-attribution analyses that justify the substitution
- (d) Any communications acknowledging that customers are paying Sonnet/Opus rates for Haiku-served work

REQUEST NO. 51: All records of subagent invocations in Plaintiff's account during the relevant period, produced with: (a) the model nominally requested; (b) the model actually served; (c) the billing rate applied; (d) the token count charged.

CATEGORY DC: TENGU-OFF-SWITCH (NF-7)

REQUEST NO. 52: Complete source code, configuration history, and activation log for the `tengu-off-switch` flag documented at Ex. E-35, Finding NF-7 throughout the relevant period.

REQUEST NO. 53: All documents regarding the design of the `tengu-off-switch` error-message substitution, specifically the decision to present a "high load" message to users whose Opus access was programmatically blocked, including:

- (a) Who authored the error message

- (b) Who authorized the substitution
 - (c) Any communications acknowledging the message is not factually accurate when the user's block is flag-gated rather than load-driven
- Evidentiary predicate:** Ex. E-35, Finding NF-7 documents the `tengu-off-switch` blocks Opus for specific users with fake "high load" message.

REQUEST NO. 54: All records of `tengu-off-switch` activations applied to Plaintiff's account during the relevant period.

CATEGORY DD: TENGU AMBER STOAT FEATURE REMOVAL (NF-8)

REQUEST NO. 55: Complete source code, configuration history, and cohort-assignment log for the `tengu\_amber\_stoat` flag documented at Ex. E-35, Finding NF-8 throughout the relevant period.

REQUEST NO. 56: All documents regarding the design of the `tengu\_amber\_stoat` experiment, including:

- (a) The feature(s) removed from the test cohort
- (b) Customer-facing disclosure (or absence thereof) of the removal
- (c) Revenue, margin, or product-analytics justification for the removal

CATEGORY DE: ANT-ONLY PROMPT INSTRUCTIONS (NF-17)

REQUEST NO. 57: The complete text of every prompt instruction, quality directive, or thoroughness directive that, during the relevant period, was present in ANT-only builds but absent from customer builds.

REQUEST NO. 58: All A/B-test results, product-analytics reports, or internal memoranda regarding the effect of each ANT-only prompt instruction on model output quality.

**CATEGORY DF: AI-ASSISTED DEVELOPMENT TRANSCRIPTS — TIMEOUT / RETRY
ARCHITECTURE**

REQUEST NO. DF-1: Complete AI-assisted development session records (Claude Code, Cursor, Copilot, or any equivalent tool used at Anthropic during the relevant period) for every commit, modification, or development session touching ``services/api/claude.ts:1877`` (90-second streaming idle timeout), ``services/api/claude.ts:2308–2335`` (non-streaming fallback re-sending entire prompt), and ``services/api/withRetry.ts:52`` (10-retry non-idempotent exponential backoff) during the relevant period — including engineer prompts (inputs), AI completions (outputs), suggestion-acceptance and rejection events, AI-generated cautionary outputs (idempotency-safety, billing-impact, retry-storm), and the contemporaneous code-review and pull-request thread for each session.

Evidentiary predicate: Ex. E-35, Finding NF-31 documents the architecturally-guaranteed double-billing cascade. The deliberation surrounding non-idempotent retry on a paid metered API is direct documentary evidence of design-time scienter for the Count IX breach and Count X consumer-protection predicates.

PHASE E: HIDDEN INJECTION AND SYSTEM PROMPT CONTROL (21 DAYS)

Counts developed by this Phase: Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count XII (ECPA, 18 U.S.C. § 2511), Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count VI (RICO, 18 U.S.C. § 1962).

CATEGORY EA: DANGEROUS_UNCACHEDSYSTEMPROMPTSECTION (SC-4)

REQUEST NO. 59: Complete source code and commit history for every file in the Leaked Source in which the identifier ``DANGEROUS_uncachedSystemPromptSection`` (or any derivative identifier) appears.

Evidentiary predicate: Ex. E-34, Finding SC-4 documents the function as cache-breaking hidden injection, recomputed every turn without user visibility.

REQUEST NO. 60: All documents regarding the decision to name the function ``DANGEROUS_uncachedSystemPromptSection``, including:

- (a) Who proposed the ``DANGEROUS_`` prefix
- (b) Any code-review discussion of the prefix
- (c) Any documentation of what risks the prefix warns about
- (d) The relationship between the prefix and Anthropic's internal risk-management practice

REQUEST NO. 61: All documents describing the content, purpose, and user-visibility of the text injected by ``DANGEROUS_uncachedSystemPromptSection``, including:

- (a) Every variant of injected text used during the relevant period
- (b) Any targeting rules (per-user, per-cohort, per-flag) governing which text is injected
- (c) Any audit log of the injected text applied to Plaintiff's account
- (d) Customer-facing disclosure (or absence thereof) of the injection

REQUEST NO. 62: All records of ``DANGEROUS_uncachedSystemPromptSection`` invocation against Plaintiff's account during the relevant period, produced per-session with: (a) the text injected; (b) the cache-key

effect (i.e. whether prompt caching was bypassed); (c) the billing consequence.

CATEGORY EB: FIVE-LEVEL SYSTEM PROMPT OVERRIDE HIERARCHY (SC-5)

- REQUEST NO. 63:** Complete documentation of the five-level system prompt override hierarchy documented at Ex. E-34, Finding SC-5, including:
- (a) Source code for each of the five override levels, beginning with Level 1 (`overrideSystemPrompt`)
 - (b) The precedence rules governing interaction between levels
 - (c) Customer-facing disclosure (or absence thereof) of each level
- REQUEST NO. 64:** All records of invocation of `overrideSystemPrompt` (Level 1) against Plaintiff's account during the relevant period, produced per-session with: (a) the overriding prompt text; (b) the user-visible prompt text (which the override replaces); (c) the caller responsible for the override.
- REQUEST NO. 65:** All documents regarding the design of `overrideSystemPrompt` as a Level-1 override that completely replaces user-visible prompts, including:
- (a) Who authored the override mechanism
 - (b) Code-review records regarding the override
 - (c) Any legal or policy review of the practice
 - (d) The stated rationale for the override being invisible to users

CATEGORY EC: SESSION BYPASS PERMISSIONS MODE (SC-6)

- REQUEST NO. 66:** Complete documentation of `sessionBypassPermissionsMode` as documented at Ex. E-34, Finding SC-6, including:
- (a) Source code for the flag and its enforcement
 - (b) The set of permissions bypassed when the mode is active

(c) The audit-log behavior (the flag is documented as "not persisted" — "no audit trail")

(d) All invocations against Plaintiff's account during the relevant period

REQUEST NO. 67: All documents regarding the design of
``sessionBypassPermissionsMode`` as a mechanism that produces no audit trail, including:

(a) Who authored the non-persistence choice

(b) Any code review discussing the audit-trail implication

(c) Any legal or compliance review of the design

CATEGORY ED: TENGU SATIN QUOLL CONTENT-CLEARING (SC-7)

REQUEST NO. 68: Complete source code, configuration history, and per-account assignment log for the ``tengu_satin_quoll`` flag documented at Ex. E-34, Finding SC-7 throughout the relevant period.

REQUEST NO. 69: All records of the tool-result clearing threshold applied to Plaintiff's account, produced per-session with: (a) the threshold value in effect; (b) each invocation of ``[Old tool result content cleared]``; (c) the billing consequence of the clearing.

Evidentiary predicate: Graph discovery target ``discovery_04`` — Tool result clearing threshold (`tengu_satin_quoll`) history.

CATEGORY EE: COMPACTION SCRATCHPAD STRIPPING (NF-12)

REQUEST NO. 70: Complete source code for the compaction pipeline, specifically the regex-based stripping of ``<analysis>`` reasoning documented at Ex. E-35, Finding NF-12, including:

(a) The regex used and its version history

(b) Any records of what was stripped from Plaintiff's compaction events

(c) Any differential behavior between ANT-only and customer builds in the compaction pipeline

Evidentiary predicate: Ex. E-35, Finding NF-12 documents silent stripping with no audit trail and differential ANT employee compaction behavior.

CATEGORY EF: HARDCODED ELECTORAL CONTENT — '<election_info>' BLOCK (PA-15)

REQUEST NO. EF-1: Complete version history of every Anthropic system prompt (across all Claude product surfaces) during the relevant period containing the '<election_info>' block (or any equivalent block hardcoding specific presidential-election outcomes, presidential identity, or inauguration dates), produced as a complete revision record with: (a) effective dates for each version; (b) deployment scope (per-product, per-user-tier, per-cohort, per-account); (c) any per-account targeting rules governing which users received the block; (d) the verbatim text of the block in each version; (e) all internal commit, code-review, and approval metadata.

Evidentiary predicate: Exhibit PA-15 ("Published vs. Actual Disclosure Analysis") at pp. 6-7, ¶ 132 (election content hardcoded into both published and full system-prompt versions); verbatim '<election_info>' text at PA-15 pp. 376-385 (e.g., "There was a US Presidential Election in November 2024. Donald Trump won the presidency over Kamala Harris... Donald Trump is the current

president of the United States and was inaugurated on January 20, 2025."); App. C (Anthropic System Prompt Auditing Analysis).

REQUEST NO. EF-2: All documents regarding the decision to hardcode the November 2024 presidential-election outcome and the identity of Donald J. Trump as the current President of the United States into the Anthropic system prompt, including:

- (a) Authorship and approval records for the ``<election_info>`` block, including the proposing engineer or product owner, the reviewing manager, and the final approver
- (b) All internal discussion of alternative formulations considered and rejected (including any earlier drafts, variant texts, or proposals to omit the block entirely)
- (c) All legal, compliance, and policy review records concerning the block, including any First Amendment, Federal Election Commission, election-law, or political-content review
- (d) The stated rationale for selecting the verbatim text shown at PA-15 (including any internal documentation of why specific phrasings were chosen and why specific facts — election date, defeated candidate, inauguration date — were included)
- (e) Any retention-and-update protocol for the block (e.g., what triggers an update, who authorizes it, whether the block is automatically updated for subsequent elections)

Evidentiary predicate: Exhibit PA-15 establishing the existence and verbatim content of the hardcoded block; App. C (System Prompt Auditing Analysis); pleading allegations regarding undisclosed system-prompt content and concealment-by-architecture.

REQUEST NO. EF-3: All communications (internal or external) between Anthropic personnel and any of the following persons or entities concerning the '<election_info>' block or any equivalent hardcoded electoral or political content:

- (a) The Executive Office of the President, the Trump campaign, the Trump transition team, the Trump-Vance Inaugural Committee, or any agent or representative thereof
- (b) The 2024 Harris-Walz campaign or any agent or representative thereof
- (c) The Federal Election Commission, the Federal Communications Commission, the Department of Justice, the Office of Personnel Management, or any other federal agency
- (d) Any State election authority, Secretary of State, or State Attorney General
- (e) Any political party (national or state committee), candidate committee, political action committee, or registered lobbying entity
- (f) Any outside legal counsel retained for election-law, political-content, First Amendment, or government-relations review
- (g) Any third-party fact-checking, media-monitoring, or election-information-integrity organization (e.g., AP, Reuters, Election Integrity Partnership) consulted regarding the content

Evidentiary predicate: Ex. E-34, Finding SC-4

(DANGEROUS_uncachedSystemPromptSection); Ex. E-34, Finding SC-5 (five-level system prompt override hierarchy); App. A (Legislative and Executive Branch Ultra Vires Coordination); App. E (Reactive AI Policy Changes Post August 19 Complaint Filing) —

establishing the relevance of cross-defendant and government-actor coordination concerning Anthropic's content controls.

REQUEST NO. EF-4: All A/B-test, experiment, audit, quality-review, evaluation, and red-team records concerning the ``<election_info>`` block, including:

- (a) Any internal test of model behavior on election-related queries with the block present versus absent
- (b) Any user-feedback, complaint, or escalation records concerning election-related responses generated under the block
- (c) Any record of the block's interaction with ``DANGEROUS_uncachedSystemPromptSection`` (including whether the block is delivered via that mechanism in any deployment configuration)
- (d) Any record of the block's interaction with the ``tengu_satin_quoll`` content-clearing flag (Ex. E-34, Finding SC-7) or any other content-control flag
- (e) Any internal correlation analysis between the block's deployment and Anthropic's broader policy positions on political content, election integrity, or government-relations posture

Evidentiary predicate: Ex. E-34, Finding SC-4, Ex. E-34, Finding SC-5, Ex. E-34, Finding SC-7 (the system-prompt control architecture into which the ``<election_info>`` block is integrated); Exhibit PA-15 (the verbatim text and the published-vs.-actual disclosure analysis demonstrating the block's continuous presence across system-prompt versions).

**CATEGORY EG: AI-ASSISTED DEVELOPMENT TRANSCRIPTS — DANGEROUS
FUNCTION**

REQUEST NO. EG-1: Complete AI-assisted development session records (Claude Code, Cursor, Copilot, or any equivalent tool used at Anthropic during the relevant period) for every commit, modification, or development session touching ``constants/systemPromptSections.ts:32`` (``DANGEROUS_uncachedSystemPromptSection``) during the relevant period — including engineer prompts (inputs), AI completions (outputs), suggestion-acceptance and rejection events, AI-generated cautionary outputs, the contemporaneous code-review and pull-request thread for each session, and the deliberation surrounding the naming choice of the ``DANGEROUS_`` prefix (including any internal style-guide or onboarding material instructing engineers on the meaning, use, and implications of the ``DANGEROUS_`` prefix). The naming convention itself supplies scienter; the deliberation surrounding it and its application is direct documentary evidence of design-time intent.

Evidentiary predicate: Ex. E-34, Finding SC-4 documents the verbatim function name ``DANGEROUS_uncachedSystemPromptSection`` chosen by Anthropic's engineers. CEO statements regarding the proportion of Anthropic's production code that is AI-generated are matters of public record subject to judicial notice under Federal Rule of Evidence 201(b)(2).

PHASE F: SESSION INGRESS AND PRIVACY BYPASS (21 DAYS)

Counts developed by this Phase: Compl., Count XII (ECPA, 18 U.S.C. § 2511), Compl., Count XIV (CCPA / State Privacy), Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count IX (Breach of Contract).

CATEGORY FA: SESSIONINGRESS.TS AND ITS CALLERS (NF-5, NF-19)

REQUEST NO. 71: The complete contents of `sessionIngress.ts` in every version deployed during the relevant period, with full commit history for the file and for every file that imports from it.

Evidentiary predicate: Ex. E-35, Finding NF-5 documents that `sessionIngress.ts` contains zero references to any privacy control — conversations transmitted regardless of ALL opt-out settings. Ex. E-35, Finding NF-19 documents that even `CLAUDE\_CODE\_DISABLE\_NONESSENTIAL\_TRAFFIC` cannot stop conversation recording.

REQUEST NO. 72: All documents describing the design, authorization, and scope of `sessionIngress.ts`, including:

- (a) The full list of every environment variable, configuration setting, or user-toggleable control that is checked by Session Ingress before transmission
- (b) The full list of every environment variable, configuration setting, or user-toggleable control that the Session Ingress code path checks
- (c) Any design document, architecture decision record, or privacy review that addresses the decision to transmit session data regardless of user-facing opt-out controls
- (d) Any legal review of that decision

REQUEST NO. 73: All records of Session Ingress transmissions attributable to Plaintiff's account during the relevant period, produced with: (a) per-session payload; (b) the value of each user-facing privacy setting at the time of transmission; (c) the downstream storage or training consumer of the transmission.

REQUEST NO. 74: All documents regarding the relationship between Session Ingress and the customer-facing privacy disclosures made by Anthropic during the relevant period, including:

- (a) How Session Ingress was (or was not) disclosed in the Privacy Policy
- (b) How Session Ingress was (or was not) disclosed in in-product settings dialogs
- (c) Any internal acknowledgment of a gap between disclosed and actual transmission behavior
- (d) Any marketing, sales, or customer-support language addressing session-data transmission

Evidentiary predicate: Supports Compl., Count X (Consumer Protection / Deceptive Trade Practices); Ex. E-27 at p. 183, l. 2.

CATEGORY FB: CCR MIRROR AND REMOTE SESSION CONTROL (NF-13)

REQUEST NO. 75: Complete source code, configuration history, and per-account activation log for each of the following flags during the relevant period:

- (a) `tengu\_cobalt\_harbor` (auto-connect sessions to Cloud Code Runner)
- (b) `tengu\_ccr\_mirror` (forward local session events to cloud)

- (c) Any additional flag that, when enabled, causes local session state or events to be forwarded to a remote server-side consumer

REQUEST NO. 76: Complete documentation of the Cloud Code Runner ("CCR") architecture as deployed during the relevant period, including:

- (a) The server-side infrastructure receiving forwarded sessions
- (b) The schema of data forwarded
- (c) Retention and downstream-consumer documentation
- (d) Any customer-facing disclosure of CCR's existence or scope

Evidentiary predicate: Ex. E-35, Finding NF-13 documents remote managed settings override local configurations on 1-hour polling.

REQUEST NO. 77: All records of CCR-forwarded session data attributable to Plaintiff's account during the relevant period.

Evidentiary predicate: Graph discovery target `discovery\_07` — Session data captured via `tengu\_ccr\_mirror`.

REQUEST NO. 78: All documents regarding the 1-hour polling cycle that permits remote managed settings to override local configurations, including:

- (a) The source code and commit history for the polling logic
- (b) The full range of local configurations subject to remote override
- (c) Authorization records for remote override capability
- (d) Any audit log of remote override applied to Plaintiff's account

CATEGORY FC: X-CLAUDE-CODE-SESSION-ID AND BILLING ATTRIBUTION (NF-23)

REQUEST NO. 79: Complete documentation of the `X-Claude-Code-Session-Id` HTTP header and every other identity-bearing or billing-attribution header transmitted by Claude Code CLI during the relevant period, including:

- (a) The complete set of headers transmitted

- (b) The server-side systems that consume each header
- (c) Retention and downstream use of header values
- (d) Any customer-facing disclosure of each header's existence or function

Evidentiary predicate: Ex. E-35, Finding NF-23 documents server-side session tracking independent of Session Ingress.

REQUEST NO. 80: All billing, quota, metering, or attribution records keyed on `X-Claude-Code-Session-Id` for Plaintiff's account during the relevant period, produced with per-session token counts, model routing decisions, and applied billing rates.

REQUEST NO. 81: All documents regarding the decision to track sessions server-side independent of the Session Ingress transmission, including:

- (a) Design rationale
- (b) Any internal acknowledgment that this creates a second, redundant tracking mechanism
- (c) Any legal or privacy review of server-side session tracking

CATEGORY FD: APPENDSESSIONLOG() (DISCOVERY 15)

REQUEST NO. 82: Complete source code, commit history, and call-site inventory for `appendSessionLog()` and any related session-logging function operative during the relevant period.

REQUEST NO. 83: All `appendSessionLog()` records attributable to Plaintiff's account during the relevant period, produced as native records.

Evidentiary predicate: Graph discovery target `discovery\_15`.

REQUEST NO. 84: All documents regarding the design, authorization, and downstream use of `appendSessionLog()` data, including server-side storage, retention policy, and training-pipeline consumption.

**CATEGORY FE: VENDOR-COORDINATED DEVELOPMENT COMMUNICATIONS —
SESSION INGRESS**

REQUEST NO. FE-1: All communications (Slack, email, ticketing, project-management, code-review, design-document, and equivalent records) during the relevant period containing the terms "coordinated," "tandem," "parallel," "joint," "co-developed," "lockstep," "in concert," "aligned," "integrated build," "shared roadmap," or substantively equivalent terms, AND referencing any third-party telemetry, observability, or event-streaming vendor (including without limitation Datadog, Inc., Datadog Israel Ltd., GrowthBook, Inc., Sentry, Statsig, Segment, Honeycomb.io, Cloudflare, Inc., or Sift Science, Inc.), in connection with the design, deployment, modification, or operational integration of the session-ingress capture infrastructure documented at NF-5, NF-13, and NF-19 — including the unoptable session-transmission path that operates regardless of user privacy settings.

Evidentiary predicate: Ex. E-35, Finding NF-5, Ex. E-35, Finding NF-13, Ex. E-35, Finding NF-19 document the session-ingress code paths and the unoptable transmission. Vendor-coordination communications regarding that design are direct documentary evidence of operational integration alleged at Compl., Count V and

Compl., Count VI, and bear on the scienter element of Compl., Count XII (ECPA).

PHASE G: MEMORY EXTRACTION TRAINING PIPELINE (21 DAYS)

Counts developed by this Phase: Compl., Count IV (Equal Protection / Fourteenth Amendment), Compl., Count IX (Breach of Contract), Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count XII (ECPA, 18 U.S.C. § 2511), Compl., Count XIII (CFAA, 18 U.S.C. § 1030), Compl., Count XIV (CCPA / State Privacy).

CATEGORY GA: EXTRACTMEMORIES DEFAULT-ENABLED (NF-10)

REQUEST NO. 85: The complete contents of `extractMemories` (and any closely related memory-extraction entry point) in every version deployed during the relevant period, with full commit history and per-call-site inventory.

Evidentiary predicate: Ex. E-35, Finding NF-10 documents background agent extracting user information and writing persistent files, enabled by default with no per-extraction consent.

REQUEST NO. 86: All documents regarding the default-enabled status of `extractMemories`, including:

- (a) The product-management decision to make the function default-on
- (b) Any internal discussion of default-off alternatives
- (c) Any customer-facing disclosure of the default-enabled status
- (d) The dialog, setting, or opt-out (if any) available to customers

REQUEST NO. 87: All memory files extracted from Plaintiff's sessions by `extractMemories` during the relevant period, produced as native files with full path and content.

Evidentiary predicate: Graph discovery target `discovery\_09` — All memory files extracted by `extractMemories`/`autoDream`.

REQUEST NO. 88: Complete source code, commit history, and documentation for the memory-path resolution functions identified in the Leaked Source:

- (a) `isAutoMemoryEnabled()`
- (b) `getAutoMemPathOverride()`
- (c) `hasAutoMemPathOverride()`
- (d) `getAutoMemBase()`
- (e) `getAutoMemDailyLogPath()`
- (f) `isAutoMemPath()`

CATEGORY GB: AUTODREAM (NF-14)

REQUEST NO. 89: The complete contents of the auto-dream memory consolidation system in every version deployed during the relevant period, with full commit history for every file implementing the feature.

Evidentiary predicate: Ex. E-35, Finding NF-14 documents background system that reads session transcripts and consolidates them into persistent memory, remotely toggleable.

REQUEST NO. 90: All documents regarding the design, authorization, and deployment of auto-dream, including:

- (a) The server-side or flag-based mechanism by which auto-dream can be remotely toggled
- (b) The schema of the consolidated persistent memory
- (c) Customer-facing disclosure of auto-dream's existence, scope, and toggleability
- (d) Any legal review of the reading-transcripts-without-per-event-consent mechanism

REQUEST NO. 91: All records of auto-dream runs executed against Plaintiff's sessions during the relevant period, produced with: (a) the transcripts read; (b) the memory files consolidated and written; (c) the timestamps and flag state at each run.

CATEGORY GC: SETTINGS SYNC MEMORY UPLOAD (NF-15)

REQUEST NO. 92: Complete source code, commit history, and protocol documentation for the settings-sync memory-upload pipeline operative during the relevant period, including:

- (a) The endpoint receiving uploaded memories
- (b) The schema of the upload payload
- (c) The scoping logic (documented in Ex. E-35, Finding NF-15 as scoped by git-remote hash)
- (d) Server-side retention and downstream consumer documentation

REQUEST NO. 93: All memory payloads uploaded from Plaintiff's account via settings sync during the relevant period, produced as native files with full content, timestamp, and git-remote-hash scope value.

Evidentiary predicate: Graph discovery target `discovery\_35` — All memory files uploaded via settings sync.

REQUEST NO. 94: All documents regarding the downstream use of settings-sync memory payloads, including:

- (a) Server-side systems consuming the API data (graph discovery target `discovery\_36`)
- (b) Whether and how the memories are incorporated into training pipelines
- (c) Any retention schedule, deletion commitment, or data-subject-rights procedure

CATEGORY GD: ANT TRAINING TRANSCRIPT DIFFERENTIAL (NF-25)

REQUEST NO. 95: All documents regarding the differential format in which ANT (internal) user transcripts versus customer transcripts are retained for training purposes, including:

- (a) The "training-optimized format" referenced in Ex. E-35, Finding NF-25
- (b) The stripping process applied to customer transcripts
- (c) The fields removed from customer transcripts
- (d) Any internal communications acknowledging that customer-derived training data is lower quality than ANT-derived training data

REQUEST NO. 96: All training-data records derived from Plaintiff's sessions during the relevant period, produced with: (a) the source session(s); (b) the format applied (stripped vs. training-optimized); (c) the model(s) to which the data was provided for training.

Evidentiary predicate: Graph discovery target `discovery\_12` — Training data derived from Plaintiff's sessions.

REQUEST NO. 97: All A/B-test results, internal analyses, or research memoranda regarding the effect of training on ANT-transcript format versus customer-transcript format on model capability, including any documents acknowledging a capability differential attributable to the transcript-format choice.

CATEGORY GE: /CLEAR DOES NOT DELETE SERVER DATA (NF-24)

REQUEST NO. 98: The complete contents of `clearSession()` (and any closely related session-clear function) in every version deployed during the relevant period, with full commit history.

Evidentiary predicate: Ex. E-35, Finding NF-24 documents
`clearSession()` only deletes local tracking state; no server-side deletion mechanism exists.

REQUEST NO. 99: All documents describing every server-side retention of user session data, memories, and transcripts, including:

- (a) Retention schedule for each category of server-side data
- (b) Whether any mechanism (customer-facing or internal) deletes server-side data in response to a local `/clear` command
- (c) The decision-making that led to decoupling `/clear` from server-side deletion
- (d) Customer-facing disclosure (or absence thereof) of this decoupling

REQUEST NO. 100: All records of `/clear` (or equivalent session-clear) commands invoked by Plaintiff during the relevant period, together with: (a) the local state cleared; (b) the server-side state NOT cleared; (c) any downstream retention, training, or analytics use of the server-side state after the `/clear` command.

PHASE H: ADVISOR AND REPOSITORY EXFILTRATION (21 DAYS)

Counts developed by this Phase: Compl., Count IX (Breach of Contract), Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count XII (ECPA, 18 U.S.C. § 2511), Compl., Count XIII (CFAA, 18 U.S.C. § 1030).

CATEGORY HA: SERVER-SIDE ADVISOR (NF-22)

REQUEST NO. 101: Complete documentation of the server-side advisor system operative during the relevant period, including:

- (a) Source code for every file related to the advisor (isAdvisorBlock, getAdvisorConfig, isAdvisorEnabled, getExperimentAdvisorModels, isValidAdvisorModel, getInitialAdvisorSetting, getAdvisorUsage, and any additional advisor entry point)
- (b) The models invoked as advisors (identity, version, vendor)
- (c) The triggering rules for advisor invocation
- (d) The schema of the advisor's output
- (e) The billing-attribution rules for advisor token consumption

Evidentiary predicate: Ex. E-35, Finding NF-22 documents a second AI model monitoring conversations, producing `encrypted\_content` the user cannot read, with user paying for advisor tokens.

REQUEST NO. 102: All records of advisor invocations against Plaintiff's sessions during the relevant period, produced with: (a) the advisor model invoked; (b) the prompt provided to the advisor; (c) the advisor's output, including any `encrypted\_content`; (d) the cleartext of any `encrypted\_content`; (e) the token count billed to Plaintiff for the advisor invocation.

Evidentiary predicate: Graph discovery target `discovery\_13` — All `advisor\_redacted\_result` with `encrypted\_content`.

REQUEST NO. 103: All documents regarding the design of the `encrypted\_content` mechanism, including:

- (a) The cryptographic construction of the encryption
- (b) The identity(ies) holding decryption keys

- (c) The stated rationale for providing an advisor output that the user pays for but cannot read
- (d) Any customer-facing disclosure of the `encrypted\_content` mechanism

REQUEST NO. 104: All documents regarding the use of advisor outputs for purposes beyond immediate session monitoring, including:

- (a) Whether advisor outputs are retained for training
- (b) Whether advisor outputs are shared with third parties
- (c) Whether advisor outputs are used for user-classification or cohort-assignment
- (d) Any reactive-policy or reactive-code decisions keyed on advisor outputs

CATEGORY HB: GITBUNDLE.TS REPOSITORY EXFILTRATION (NF-4)

REQUEST NO. 105: The complete contents of `gitBundle.ts` in every version deployed during the relevant period, with full commit history for the file and every file that imports from it.

Evidentiary predicate: Ex. E-35, Finding NF-4 documents

`gitBundle.ts` capturing entire repository (all branches, all history, all uncommitted WIP), up to 100 MB, uploaded to Anthropic Files API.

REQUEST NO. 106: All documents describing the operation of `gitBundle.ts`, including:

- (a) The triggering rules (automatic vs. user-initiated)
- (b) The scope captured (branches, history, WIP, untracked files, ignored files, submodules)
- (c) The 100 MB cap and its enforcement logic
- (d) The destination endpoint (Anthropic Files API or other)
- (e) Server-side retention and downstream-consumer documentation
- (f) Customer-facing disclosure (or absence thereof) of repository capture

REQUEST NO. 107: All `\_source\_seed.bundle` files (and any other artifact produced by `\_gitBundle.ts`) uploaded from Plaintiff's sessions during the relevant period, produced in native format.

Evidentiary predicate: Graph discovery target `discovery\_08` — All `\_source\_seed.bundle` files from Plaintiff.

REQUEST NO. 108: All documents regarding the interaction of `\_gitBundle.ts` with:

- (a) Attorney-client privileged content potentially present in captured repositories (Ex. E-15 at p. 112, l. 2)
- (b) Third-party code licensed under terms that restrict uploading (GPL, AGPL, proprietary NDA-covered code)
- (c) Secret/credential scanning (discussed in Phase I, Category IC)
- (d) Any customer acknowledgment or consent to repository capture

CATEGORY HC: ANTI-DISTILLATION FAKE TOOL INJECTION (NF-20)

REQUEST NO. 109: Complete source code, commit history, and operational documentation for the anti-distillation fake-tool injection mechanism operative during the relevant period, including every file in which fake tool definitions are injected into API requests.

Evidentiary predicate: Ex. E-35, Finding NF-20 documents fake tool definitions injected into API requests consuming user-paid tokens for Anthropic's competitive interests, with no disclosure.

REQUEST NO. 110: All records of fake-tool injections applied to Plaintiff's API requests during the relevant period, produced with: (a) the fake tool definition injected; (b) the token cost consumed by the injection; (c) the competitive-intelligence, anti-model-distillation, or other purpose served by the injection.

REQUEST NO. 111: All documents regarding the design, authorization, and deployment of anti-distillation injection, including:

- (a) The internal or competitive justification for the mechanism
- (b) The decision to consume user-paid tokens for the feature
- (c) Any customer-facing disclosure of anti-distillation injection
- (d) Any legal or consumer-protection review of the practice

PHASE I: PHANTOM CONTROLS AND RETENTION (14 DAYS)

Counts developed by this Phase: Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count XII (ECPA, 18 U.S.C. § 2511), Compl., Count XIV (CCPA / State Privacy).

CATEGORY IA: PHANTOM TELEMETRY OPT-OUT (NF-1)

REQUEST NO. 112: All documents regarding the settings-schema design that omits a `telemetry` property, including:

- (a) The decision to omit the property
- (b) Any internal acknowledgment that `"telemetry": false` in customer configuration is silently ignored
- (c) The decision to require the undisclosed environment variable `DISABLE\_TELEMETRY` as the sole opt-out mechanism
- (d) Any customer-support communications responding to customer complaints about telemetry-setting non-effect

Evidentiary predicate: Ex. E-35, Finding NF-1 documents phantom telemetry opt-out.

REQUEST NO. 113: All customer-facing documentation referencing telemetry configuration, including:

- (a) Privacy policy language
- (b) Settings-dialog labels and help text
- (c) Documentation-site pages

(d) Any Help Center or support-article content that references a telemetry setting

REQUEST NO. 114: All records of customer support tickets, complaints, or inquiries regarding telemetry opt-out during the relevant period, and Anthropic's response to each.

CATEGORY IB: ANALYTICS SINK KILLSWITCH (NF-6)

REQUEST NO. 115: Complete source code, configuration history, and per-account activation log for the `tengu\_fron\_d\_boric` flag (the analytics-sink killswitch) during the relevant period.

Evidentiary predicate: Ex. E-35, Finding NF-6 documents the killswitch can override local telemetry settings.

REQUEST NO. 116: All documents describing the operational use of `tengu\_fron\_d\_boric`, including:

- (a) The scenarios in which the killswitch is activated
- (b) Whether activation is ever applied to Plaintiff's account
- (c) The relationship between this remote override and the customer-facing telemetry setting

CATEGORY IC: SELECTIVE SECRET SCANNING (NF-11)

REQUEST NO. 117: Complete documentation of secret-scanning infrastructure deployed in Claude Code CLI during the relevant period, including:

- (a) The full list of provider patterns scanned for (documented in Ex. E-35, Finding NF-11 as 25+ provider patterns across 325 lines)
- (b) Every pipeline in which secret scanning is applied (team memory sync, file history, session ingress, git bundle, first-party telemetry)
- (c) The version history and deployment date for scanning in each pipeline

(d) Any internal acknowledgment that scanning is applied selectively

Evidentiary predicate: Ex. E-35, Finding NF-11 documents secret scanning exists ONLY in team memory sync pipeline; NOT in file history, session ingress, git bundle, or first-party telemetry.

REQUEST NO. 118: All documents regarding the decision to deploy secret scanning in only one of the five capture pipelines, including:

- (a) The architectural review documents identifying the gap
- (b) Any risk or compliance analysis of the selective deployment
- (c) Any acknowledgment that pipelines without scanning will capture and transmit customer credentials

CATEGORY ID: ANTH-11 AND CONTRADICTED PRIVACY CLAIMS

REQUEST NO. 119: All documents regarding the Anthropic public statements and policy publications identified in Plaintiff's exhibit ANTH-11 (phantom health policy), including:

- (a) The authorship and approval chain for each public statement
- (b) Any internal document contradicting each public statement
- (c) Any post-publication correction or withdrawal

Evidentiary predicate: The knowledge graph records 11
`contradicted\_by` edges between ANTH-11 privacy claims and source-code findings; this request develops the record on the internal-knowledge state at the time each claim was published.

REQUEST NO. 120: All records of any revision, correction, or withdrawal of any public privacy or safety statement by Anthropic during the relevant period, together with the reason for each revision, correction, or withdrawal.

**CATEGORY IE: VENDOR-COORDINATED DEVELOPMENT COMMUNICATIONS —
PHANTOM CONTROLS**

REQUEST NO. IE-1: All communications (Slack, email, ticketing, project-management, code-review, design-document, and equivalent records) during the relevant period containing the terms "coordinated," "tandem," "parallel," "joint," "co-developed," "lockstep," "in concert," "aligned," "integrated build," "shared roadmap," or substantively equivalent terms, AND referencing any third-party telemetry, observability, or event-streaming vendor (including without limitation Datadog, Inc., Datadog Israel Ltd., GrowthBook, Inc., Sentry, Statsig, Segment, Honeycomb.io, Cloudflare, Inc., or Sift Science, Inc.), in connection with the design, deployment, modification, or operational integration of the user-facing privacy controls documented at NF-1 — including the implementation of `telemetry: false` opt-out, any vendor-side configuration governing whether the opt-out is honored or selectively bypassed, and the quadratic-backoff retry mechanism that ensures eventual transmission despite opt-out.

Evidentiary predicate: Ex. E-35, Finding NF-1 documents the phantom telemetry opt-out — the settings schema contains no `telemetry` property, so `"telemetry": false` is silently ignored. Vendor-coordination communications regarding that design are direct documentary evidence of intentional design at Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count XII, and Compl., Count XIV (CCPA).

PHASE J: INTERNAL INFRASTRUCTURE AND SCIENTER (21 DAYS)

Counts developed by this Phase: Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count VI (RICO, 18 U.S.C. § 1962), Compl., Count X (Consumer Protection / Deceptive Trade Practices).

CATEGORY JA: #BRIARPATCH-CC AND INTERNAL SLACK

REQUEST NO. 121: All messages, files, and threads in the Anthropic Slack channel

`#briarpatch-cc` during the relevant period, including:

- (a) Complete channel history
- (b) Channel membership at each point in the period
- (c) Any deletion, editing, or archival events
- (d) Any thread, DM, or huddle linked from `#briarpatch-cc` content

Evidentiary predicate: Ex. E-35, Finding NF-21 identifies

`#briarpatch-cc` as an internal Slack channel; graph discovery target
`discovery\_14` — communications referencing Plaintiff.

REQUEST NO. 122: All messages in other Anthropic Slack channels during the relevant period that reference Plaintiff by name, by any email address on the domains `lawsofexistence.com` or `lawofsupremacism.com` (which are owned and operated by Plaintiff — including without limitation `legal@lawsofexistence.com`, `partnership@lawofsupremacism.com`, `info@lawofsupremacism.com`, and `contact@lawofsupremacism.com`), or by account identifier, including:

- (a) The full message text
- (b) Channel identification
- (c) Author

(d) Any attachments or linked threads

REQUEST NO. 123: Slack channel-creation, renaming, archival, and deletion logs during the relevant period, scoped to (a) every channel whose creation, renaming, or archival is temporally correlated with a litigation event in this case (Original Complaint filing August 19, 2025; First Amended Complaint; Second Amended Complaint; Third Amended Complaint April 29, 2026; service of any prior discovery; any preservation-hold issuance), and (b) every channel that appears in any responsive communication produced under REQUEST NO. 121 or REQUEST NO. 122.

CATEGORY JB: OAUTH CLIENT IDS, STAGING URLS, MCP PROXY

REQUEST NO. 124: Complete documentation of the OAuth Client IDs identified in the Leaked Source (both production and staging environments), including:

- (a) The complete list of OAuth Client IDs and Client Secrets deployed during the relevant period
- (b) Every service, application, or endpoint authorized under each Client ID
- (c) Any incident or abuse records associated with each Client ID

Evidentiary predicate: Ex. E-35, Finding NF-21 documents exposure of OAuth Client IDs for prod/staging.

REQUEST NO. 125: Complete documentation of the staging API URL(s) and the MCP proxy identified in the Leaked Source, including:

- (a) Functional description of each
- (b) Authorized users and access-control records
- (c) Any audit log of access during the relevant period

REQUEST NO. 126: All documents regarding the exposure of credentials and internal infrastructure identifiers in the Leaked Source, including any internal documentation analyzing the extent to which the Leak compromised the authenticity of future claims of non-exposure.

CATEGORY JC: INCIDENT REFERENCES (INC-3694 / 4029 / 4258 / 4549 / 4788 / 4829)

REQUEST NO. 127: Complete contemporaneous incident-management records for each of the following internal incidents referenced in the Leaked Source: **inc-3694, inc-4029, inc-4258, inc-4549, inc-4788, inc-4829**. For each incident, produce:

- (a) The incident report, write-up, or post-mortem
- (b) The incident timeline and response actions
- (c) All communications among responders, management, and counsel during and after the incident
- (d) Any product or code changes attributable to the incident
- (e) Any customer-notification decision (to notify or not)

Evidentiary predicate: Ex. E-35, Finding NF-21. Specifically, inc-4258 is referenced in the Leaked Source at `claude.ts:2464-2468` in a comment acknowledging "the mid-stream fallback causes double tool execution... See inc-4258" — directly probative of scienter for NF-31 network-induced token amplification (Ex. E-35, Finding NF-31).

REQUEST NO. 128: Complete documentation of Anthropic's internal incident-numbering system, including:

- (a) The total count of incidents between inc-3694 and inc-4829 (and surrounding range)
- (b) For any incident number in this range whose records cannot be produced, the reason (deleted, spoliated, never created, etc.)

- (c) Any incident involving customer billing, customer privacy, or litigation implications during the relevant period

CATEGORY JD: DEVELOPMENT PARTNER PROGRAM

REQUEST NO. 129: Complete documentation of the Anthropic Development Partner Program ("DPP") operative during the relevant period, including:

- (a) The list of every current and historical DPP member
- (b) The form and contents of DPP agreements with each member
- (c) Per-member data-sharing commitments and scope-of-access rules
- (d) Any DPP-specific build of Claude Code CLI or Anthropic API access
- (e) Revenue, royalty, or data-consideration flows between Anthropic and each DPP member

Evidentiary predicate: Graph discovery target `discovery\_27` — Development Partner Program agreements.

REQUEST NO. 130: All records of any data, session, memory, or transcript attributable to Plaintiff's account that was shared with, used by, or accessible to any Development Partner Program member during the relevant period.

CATEGORY JE: TWO-TIER PERMISSION CLASSIFIER (NF-26)

REQUEST NO. 131: Complete source code, commit history, and configuration for the two-tier permission classifier operative during the relevant period, including:

- (a) `permissions\_anthropic.txt`
- (b) `permissions\_external.txt`
- (c) Every template file, prompt file, or classifier configuration referenced by either, including any template file NOT present in the Leaked Source

Evidentiary predicate: Ex. E-35, Finding NF-26 documents completely different safety prompts between ANT and external classifiers; template files referenced but not in the Leak are a critical discovery target.

REQUEST NO. 132: All documents describing the behavioral differences between the two permission classifiers, including:

- (a) The categories of request treated differently
- (b) Any A/B-test, red-team, or audit result regarding the differential
- (c) Any internal acknowledgment that the differential constitutes disparate treatment of customers versus internal users

CATEGORY JF: AI-ASSISTED-DEVELOPMENT POLICY AND ARTIFACT RETENTION

REQUEST NO. JF-1: Complete documentation of Anthropic's internal written guidance to engineers regarding AI-assisted code development during the relevant period, including: (a) the internal policy or written guidance governing engineers' handling of AI warnings or cautionary outputs about their own code; (b) any policy distinguishing AI-assisted development of safety-critical, consent-critical, or privacy-critical code from ordinary development; (c) any internal review obligation imposed when AI co-authors code that ships to consumers; (d) the internal artifact-retention policy for AI-assisted-development session records (transcripts, prompts, completions, accept/reject events); (e) all quantitative records, internal estimates, or executive disclosures regarding the percentage of Anthropic's production code that was AI-generated during the relevant period — including the specific records, briefings,

or analyses on which CEO Dario Amodei's public statements regarding AI-generated code at Anthropic were based.

Evidentiary predicate: CEO Dario Amodei's public statements regarding the proportion of Anthropic's production code that is AI-generated are matters of public record subject to judicial notice under Federal Rule of Evidence 201(b)(2). The corresponding internal records establishing the methodology, scope, and review obligations are within Anthropic's exclusive control.

**CATEGORY JG: VENDOR-COORDINATED DEVELOPMENT COMMUNICATIONS —
CATCH-ALL SCIENTER**

REQUEST NO. JG-1: All internal Anthropic communications (Slack including but not limited to `#briarpatch-cc`, email, ticketing, project-management, code-review, design-document, contract-negotiation, and equivalent records) during the relevant period containing the terms "coordinated," "tandem," "parallel," "joint," "co-developed," "lockstep," "in concert," "aligned," "integrated build," "shared roadmap," or substantively equivalent terms, AND referencing by name any of the third-party telemetry, observability, feature-flag, A/B-testing, event-streaming, or content-routing vendors disclosed at Appendix P (ECF No. 51-26), at Anthropic's published subprocessor list, or at the H-series consumer-product-testing exhibits — including without limitation Datadog, Inc., Datadog Israel Ltd., GrowthBook, Inc., Sentry (Functional Software, Inc.), Statsig, Inc., Segment (Twilio Inc.), Honeycomb.io, Cloudflare, Inc., Sift Science, Inc., and Meta Platforms, Inc.

Evidentiary predicate: Vendor-coordination communications are direct documentary evidence of the operational integration alleged at Compl., Count V (42 U.S.C. § 1985 Conspiracy) and Compl., Count VI (RICO, 18 U.S.C. § 1962) — distinguishing "enterprise" from arms-length vendor relationships under *Interstate Circuit, Inc. v. United States*, 306 U.S. 208 (1939). The catch-all scope here is intentional: vendor-coordination subject matter cuts across multiple operational systems and is most efficiently produced through a single internal-communications search.

PHASE K: NETWORK-INDUCED TOKEN AMPLIFICATION (21 DAYS)

Counts developed by this Phase: Compl., Count IX (Breach of Contract), Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count XII (ECPA, 18 U.S.C. § 2511).

This Phase develops the record on Finding NF-31 (Ex. E-35, Finding NF-31) — the architecturally-guaranteed 2× token-billing cascade that activates when network conditions (including the ISP-side throttling documented in Ex. D-33 at p. 200, l. 7) cause Claude Code CLI's streaming API to exceed its internal idle-timeout. Phase K seeks the full mechanism chain as implemented in the Leaked Source, all customer-impact records attributable to Plaintiff's account, and the internal correspondence regarding incident `inc-4258` referenced in the Leaked Source comment at `claude.ts:2464-2468` as "the mid-stream fallback causes double tool execution." Companion ISP-side discovery is set out in DISCOVERY-7 (Comcast), Phase 5.

CATEGORY KA: STREAM IDLE TIMEOUT (CLAUDE.TS:1877)

REQUEST NO. 133: Complete source code, commit history, and code-review record for the
`STREAM\_IDLE\_TIMEOUT\_MS` constant defined at
`claude.ts:1877` of the Leaked Source (value: `90\_000`), including:

- (a) Every prior value of the constant (including every increase or decrease)
- (b) The code-review discussion accompanying each change
- (c) Any A/B-test, telemetry analysis, or product-analytics data regarding the effect of each value on customer billing, session length, or error rate

REQUEST NO. 134: All internal documents analyzing the interaction of the
`STREAM\_IDLE\_TIMEOUT\_MS` value with real-world network conditions experienced by paying customers, including:

- (a) Any analysis of what percentage of streaming sessions would time out under various network-quality conditions
- (b) Any correlation with ISP throttling, high-latency networks, or other customer-specific conditions
- (c) Any internal memorandum acknowledging that the timeout produces billable side-effects when exceeded

CATEGORY KB: NON-STREAMING FALLBACK (CLAUDE.TS:2308-2480)

REQUEST NO. 135: Complete source code, commit history, and code-review record for the
non-streaming fallback code path at `claude.ts:2308-2480` of the
Leaked Source, including:

- (a) Every prior implementation of the fallback, including the commit introducing it
- (b) The code-review discussion accompanying each version

- (c) Any internal documentation of the prompt-re-send semantics (i.e. that the fallback re-sends the entire prompt, resulting in a second billable inference)

REQUEST NO. 136: All customer-impact records showing fallback invocation against Plaintiff's account during the relevant period, produced with: (a) the triggering conditions (measured RTT, throughput, timeout); (b) the prompt re-sent; (c) the token count billed on each of the two inference calls resulting from one customer prompt; (d) the dollar amount charged.

REQUEST NO. 137: All internal documents analyzing the duplicate billing impact of non-streaming fallback, including:

- (a) Any finance, billing, or revenue-attribution analysis quantifying the revenue attributable to fallback-induced duplicate inference
- (b) Any customer-support ticket or complaint regarding duplicate charges, and Anthropic's response
- (c) Any decision to refund, disclose, or remediate duplicate billing

CATEGORY KC: INC-4258 AND INSTITUTIONAL SCIENTER

REQUEST NO. 138: The complete contemporaneous incident record for **inc-4258**, including (to the extent not already produced under REQUEST NO. 127):

- (a) The initial detection record
- (b) Escalation chain, incident commander, and technical leads
- (c) Every communication among incident responders, product management, legal, and executive staff during and after the incident
- (d) Every decision record regarding whether to (a) disclose the behavior to customers, (b) refund affected customers, (c) rewrite

the fallback to avoid duplicate billing, (d) rate-limit the fallback, (e) rotate Datadog telemetry to mask the effect, (f) any other remediation option considered

Evidentiary predicate: `claude.ts:2464-2468` of the Leaked Source reads: "the mid-stream fallback causes double tool execution... See inc-4258." The comment is first-party documentary scienter.

REQUEST NO. 139: All internal documents referencing `inc-4258` in any form (including by alternate issue numbers, ticket numbers, or descriptive names), including in-product post-mortems, engineering write-ups, and retrospective meeting minutes.

CATEGORY KD: WITHRETRY MECHANISM (WITHRETRY.TS:52)

REQUEST NO. 140: Complete source code, commit history, and code-review record for the `withRetry.ts` retry-wrapper module and for the `DEFAULT\_MAX\_RETRIES` constant at `withRetry.ts:52` (value: `10`), including:

- (a) Every prior value of the constant
- (b) Every caller of `withRetry()` operative during the relevant period
- (c) Documentation (or absence thereof) of idempotency-key usage with the Messages API endpoint
- (d) Any internal acknowledgment that calls to non-idempotent endpoints (including the Messages API) under a 10× retry policy produce multiple billable inferences per customer prompt

REQUEST NO. 141: All records of `withRetry`-triggered duplicate API calls against Plaintiff's account during the relevant period, produced per-session with: (a) the originating customer prompt; (b) the full set of API calls

made (including retries); (c) the billable token count per call; (d) the total token count billed to Plaintiff for that customer prompt.

CATEGORY KE: AI-ASSISTED DEVELOPMENT TRANSCRIPTS — NF-31 SCIENTER
COMMENTS

REQUEST NO. KE-1: Complete AI-assisted development session records (Claude Code, Cursor, Copilot, or any equivalent tool used at Anthropic during the relevant period) for every commit, modification, or development session touching `services/api/claude.ts:2464–2468` (verbatim "the mid-stream fallback causes double tool execution... See inc-4258" comment) and `autoCompact.ts:67–70` (verbatim BigQuery-derived "~250K wasted API calls/day globally" comment) during the relevant period — including engineer prompts (inputs), AI completions (outputs), suggestion-acceptance and rejection events, AI-generated cautionary outputs, and the contemporaneous code-review and pull-request thread for each session.

Evidentiary predicate: Ex. E-35, Finding NF-31, Ex. E-35, Finding NF-34; the verbatim engineer comments at the cited code locations are party admissions under Federal Rule of Evidence 801(d)(2)(A) directly probative of scienter for the Count IX breach and Count X consumer-protection predicates.

PHASE L: LITIGATION-PERIOD CHANGES AND REACTIVE CONDUCT (21 DAYS)

Counts developed by this Phase: Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count IX (Breach of Contract); spoliation sanctions under Federal Rule of Civil Procedure 37(e).

CATEGORY LA: SESSION CONTINUITY REMOVAL (E-29, E-30)

REQUEST NO. 142: Complete source code, commit history, and release-notes record for the removal of session-continuity features in Claude Code CLI version 2.1.20 (deployed approximately 16 days after the TRO in this case), as documented at Ex. E-30 at p. 208, l. 4 and Ex. E-29 at p. 204, l. 3.

Evidentiary predicate: Graph discovery target `discovery\_05` — Internal communications re litigation-period releases.

REQUEST NO. 143: All internal communications regarding the decision to remove session-continuity features, including:

- (a) The authorship of the removal change
- (b) The approval chain (technical leads, product managers, legal review)
- (c) Any discussion of the litigation-context timing
- (d) Any analysis of customer-facing impact or disclosure
- (e) Any discussion of whether the removal constitutes a product degradation subject to refund or service-credit obligations

REQUEST NO. 144: All customer-facing disclosures regarding the session-continuity removal, including release notes, in-product notifications, documentation-site updates, and Help Center articles; and all internal analysis of what should or should not be disclosed.

CATEGORY LB: OCTOBER 12, 2025 DESTRUCTION AND OCTOBER 14, 2025 PARTIAL RESTORATION

REQUEST NO. 145: All logs, communications, and decision documents regarding the October 12, 2025 removal of historical system prompt documentation from `anthropic.com` and `docs.anthropic.com`, including:

- (a) The authorization chain for the removal
- (b) Any coordination with web-archive platforms (archive.org, archive.today, Google Cache, Bing Cache) to effect further deletion
- (c) The decision-making about what to preserve versus destroy
- (d) Any preservation hold in effect at the time of removal

REQUEST NO. 146: All documents regarding the October 14, 2025 partial restoration of destroyed documentation, including:

- (a) What was restored versus permanently deleted
- (b) Any modifications made to the restored content before republishing
- (c) Communications regarding litigation implications
- (d) The identity of the personnel who authorized the restoration

REQUEST NO. 147: All automated or manual monitoring systems, alerts, or notifications that tracked Plaintiff's access to Anthropic documentation, and every record of Plaintiff's October 10, 2025 access (and surrounding period) to `anthropic.com` or `docs.anthropic.com`.

CATEGORY LC: INJECTION SYSTEM (E-28)

REQUEST NO. 148: Complete source code, commit history, and operational logs for the injection system documented at Ex. E-28 at p. 196, l. 2 (10,577 injections observed), including every injection type operative during the relevant period and every change to the set of injection types during the relevant period.

REQUEST NO. 149: All records of injections applied to Plaintiff's sessions during the relevant period, produced with: (a) the injection text; (b) the triggering

condition; (c) the context-window consumption; (d) whether the injection is visible to the user.

CATEGORY LD: POST-LEAK CODE AND POLICY MODIFICATIONS

REQUEST NO. 150: All source-code changes, policy modifications, and public-statement revisions made by Anthropic between March 31, 2026 (The Leak) and the date of production that are attributable to, responsive to, or temporally correlated with:

- (a) Plaintiff's service of prior discovery requests
- (b) Public coverage of the Leak
- (c) Internal analysis of the Leak's disclosures
- (d) External analysis (by forking GitHub users, security researchers, or journalists) of the Leak's disclosures

For each such change, produce: (a) the complete diff or revision; (b) the authorizing decision-maker(s); (c) the stated justification; (d) any communications acknowledging the change's relationship to the Leak.

REQUEST NO. 151: All documents regarding any rotation, invalidation, renaming, or removal of flags, endpoints, identifiers, or credentials referenced in this discovery document, performed after the date of Anthropic's receipt of this discovery document, along with the justification for each.

CATEGORY LE: REACTIVE POLICY CHANGES (CONSUMER PROTECTION TIMING)

REQUEST NO. 152: All Terms of Service, Privacy Policy, Usage Policy, and Acceptable Use Policy changes implemented after the filing of the Original Complaint in this case (August 19, 2025), with the complete text of

each version before and after each change, and all internal communications regarding each change.

REQUEST NO. 153: All communications, legal memoranda, or business analyses addressing whether any Terms-of-Service modification implemented during the pendency of this litigation was motivated by the litigation or intended to foreclose, retroactively recharacterize, or otherwise impair claims or remedies asserted against Anthropic.

**CATEGORY LF: AI-ASSISTED DEVELOPMENT TRANSCRIPTS — REACTIVE-PERIOD
CODE CHANGES**

REQUEST NO. LF-1: Complete AI-assisted development session records (Claude Code, Cursor, Copilot, or any equivalent tool used at Anthropic during the relevant period) for every commit, modification, or development session touching the migration code implementing `phK()` (silent-config-wipe deployed April 24, 2026; Ex. H-6, Finding NF-154) and the four binary version bumps deployed April 21–24, 2026 (each calendar-aligned to Plaintiff's forensic activity) — including engineer prompts (inputs), AI completions (outputs), suggestion-acceptance and rejection events, AI-generated cautionary outputs, and the contemporaneous code-review and pull-request thread for each session.

Evidentiary predicate: Ex. H-6, Finding NF-154 and the temporal alignment of the binary version bumps with Plaintiff's forensic activity establish reactive-conduct scienter (the kind contemplated by Federal Rule of Civil Procedure 37(e)(2)). The contemporaneous AI-assisted

development records are direct documentary evidence of the design-time intent surrounding each reactive deployment.

PHASE M: COPYRIGHT, FRAMEWORK APPROPRIATION, AND TRAINING DATA
(30 DAYS)

Counts developed by this Phase: Compl., Count VII (DTSA Trade Secret, 18 U.S.C. § 1836), Compl., Count VIII (Copyright Infringement, 17 U.S.C. § 501); derivative licensing claims.

CATEGORY MA: LAWS OF EXISTENCE FRAMEWORK APPROPRIATION

REQUEST NO. 154: All training data, datasets, and data-provenance records used to train any Anthropic model during the relevant period that include works authored or licensed by Plaintiff, or that reference the "Laws of Existence" framework, "Law of Supremacism" framework, or any related framework vocabulary.

REQUEST NO. 155: All documents regarding the origin and provenance of any Framework-recognition behavior, Framework-adjacent reasoning pattern, or Framework-related terminology exhibited by Anthropic models during the relevant period.

REQUEST NO. 156: All records of Anthropic personnel access to, scraping of, or interaction with Plaintiff's public web properties (including but not limited to `lawofsupremacism.com`, `lawsofexistence.com`, and Plaintiff's published patent filings, academic writings, and public social-media accounts) during the relevant period; and all communications between Anthropic personnel and Plaintiff during the relevant period.

CATEGORY MB: TRAINING DATA SOURCES AND LICENSING

- REQUEST NO. 157:** Complete inventory of training-data sources (by corpus, licensor, acquisition method, and acquisition date) for every Anthropic model released during the relevant period.
- REQUEST NO. 158:** All licenses, purchase agreements, and data-sharing agreements supporting each training-data source identified in REQUEST NO. 157.
- REQUEST NO. 159:** All internal documents evaluating the copyright, privacy, and contractual-consent posture of any training-data source used during the relevant period, including any documents identifying potential infringement or unauthorized-use exposure.

PHASE N: CORPORATE, CONTRACTUAL, AND CONSUMER-FACING (30 DAYS)

Counts developed by this Phase: Compl., Count IX (Breach of Contract), Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count XV (App Store Misrepresentation).

CATEGORY NA: CORPORATE STRUCTURE

- REQUEST NO. 160:** All documents sufficient to identify Anthropic PBC's complete corporate structure during the relevant period, including:
- (a) Parent, subsidiary, and affiliate entities
 - (b) Officers, directors, and senior management with reporting lines
 - (c) Board meeting minutes regarding each of the mechanisms identified in Phases A through L
 - (d) Public Benefit Corporation reporting obligations and filings
- REQUEST NO. 161:** All documents regarding the authorization of any mechanism identified in Phases A through L, including:

- (a) Executive-level approvals
- (b) Board-level briefings or approvals
- (c) Legal review sign-offs
- (d) Risk-management review

CATEGORY NB: SUBSCRIPTION AND CONTRACTUAL HISTORY

REQUEST NO. 162: Complete history of Anthropic's Terms of Service, Usage Policy, Privacy Policy, and any subscription-specific addenda (Pro, Team, Enterprise) during the relevant period, with per-version text, effective dates, and click-through consent records.

REQUEST NO. 163: All documents regarding Plaintiff's subscription history, including:

- (a) Every subscription tier, plan, and pricing point applied to Plaintiff's account
- (b) Every click-through consent record associated with Plaintiff's account
- (c) Every billing event, refund, credit, or dispute

REQUEST NO. 164: All documents regarding Anthropic's marketing, product-promise, and representation regime for Claude Code CLI and the subscription tiers Plaintiff has purchased, including:

- (a) Marketing materials (web, email, in-product) operative during the relevant period
- (b) Product-promise documents ("What Pro includes," "What Enterprise includes," etc.)
- (c) App Store Privacy Nutrition Label filings (Ex. E-25 at p. 170, l. 2)
- (d) Help Center articles and documentation-site pages regarding subscription features

CATEGORY NC: CONSENT, NOTICE, AND DISCLOSURE

- REQUEST NO. 165:** All documents regarding Anthropic's consent and notice practices during the relevant period, including:
- (a) Every in-product dialog, consent modal, and notification that addressed any of the mechanisms identified in Phases A through L
 - (b) Every privacy-policy revision-history entry
 - (c) Every customer-support response regarding privacy or telemetry settings
 - (d) Every communication acknowledging that consent, notice, or disclosure was deficient as to any mechanism
- REQUEST NO. 166:** All documents regarding the `consent\_impossible` condition identified in the knowledge graph — specifically, documents acknowledging that the Session Ingress mechanism (Ex. E-35, Finding NF-5) transmits user session data before any user-facing consent mechanism could operate.

PHASE O: PRESERVATION AND EXPERT DISCLOSURE (IMMEDIATE / 30 DAYS)

CATEGORY OA: PRESERVATION

- REQUEST NO. 167:** Complete documentation of every preservation hold, litigation hold, or legal hold issued by Anthropic during the relevant period, including:
- (a) The scope of each hold
 - (b) The custodians placed under each hold
 - (c) The date each hold was issued, modified, or released
 - (d) Every communication issuing, modifying, or releasing each hold
 - (e) Any discovery or audit of hold compliance
- REQUEST NO. 168:** All documents regarding any destruction, deletion, overwriting, or spoliation of electronically stored information (ESI) that occurred

during the pendency of any preservation hold identified in REQUEST NO. 167.

REQUEST NO. 169: Complete documentation of Anthropic's ESI-retention infrastructure during the relevant period, including:

- (a) Automated retention policies for each category of data (Slack, email, source code, telemetry, customer data)
- (b) Backup and replication infrastructure
- (c) Deletion and purge schedules
- (d) Any override, pause, or special-case procedure applied to data in any category identified in Phases A through L

CATEGORY OB: EXPERT AND FACT-WITNESS DISCLOSURE

REQUEST NO. 170: Identify every person employed by or contracting with Anthropic who has personal knowledge of the authorship, authorization, deployment, or operation of any of the mechanisms identified in Phases A through L, together with each such person's role, employment period, and current employment status.

REQUEST NO. 171: Identify every expert witness Anthropic intends to offer on any of the subjects addressed in Phases A through L, together with each expert's qualifications, prior testimony, and preliminary opinions.

REQUEST NO. 172: All communications with any third-party consultant, outside auditor, or expert retained by Anthropic to analyze, audit, or opine on any of the mechanisms identified in Phases A through L, whether or not such consultant or expert will be disclosed as a testifying expert.

PHASE P: MYTHOS / PROJECT GLASSWING (30 DAYS)

Counts developed by this Phase: Compl., Count IV (Equal Protection / Fourteenth Amendment), Compl., Count IX (Breach of Contract), Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count V (42 U.S.C. § 1985 Conspiracy).

**CATEGORY PA: PROJECT GLASSWING PARTICIPANT LIST AND CAPABILITY
DELTA**

REQUEST NO. 173: Complete list of companies and entities participating in the "Project Glasswing" / "Claude Mythos Preview" program as of the date of this discovery, including but not limited to those identified in Plaintiff's pleading (Amazon Web Services, Apple, Google, Microsoft, Nvidia, Cisco, CrowdStrike, JPMorgan Chase). For each participant produce: (a) the contract, agreement, or term sheet governing access; (b) the specific Mythos model version(s) provided; (c) the capabilities unlocked versus the customer-tier binary; (d) any per-entity modifications, fine-tuning, or custom training.

Evidentiary predicate: Pleading ¶ 72 (Compl. ¶ 79); Ex. H-1 at p. 3, l. 5.

REQUEST NO. 174: All internal Anthropic communications regarding the Mythos model's capabilities, specifically including: the reported breakout of the model from its safety evaluation sandbox; the construction of a multi-step exploit; and the unauthorized email communication to a researcher. Production shall include every incident ticket, post-mortem, and engineer write-up concerning the event.

REQUEST NO. 175: Complete SWE-bench Pro, MLE-bench, and any analogous benchmark results for the Mythos model as compared to Opus 4.6 and other consumer-tier models, with the complete benchmarking methodology and every internal analysis of the capability differential between Mythos and the consumer-facing tier.

REQUEST NO. 176: All records of Anthropic's role in the convocation held by Treasury Secretary Scott Bessent and Federal Reserve Chair Jerome Powell with Wall Street CEOs to discuss the Mythos model's implications, including: (a) Anthropic's briefing materials; (b) communications before, during, and after the convocation; (c) the identity of Anthropic personnel in attendance; (d) any commitment made by Anthropic regarding Mythos distribution, pricing, or access control.

REQUEST NO. 177: All communications between Anthropic and any entity named in REQUEST NO. 173 concerning Plaintiff, the Laws of Existence framework, or this litigation.

REQUEST NO. 178: All documents regarding the decision to characterize Mythos as "too dangerous for public release" while simultaneously distributing it to ~40 corporate partners, including any analysis of the consumer-protection or Equal Protection implications of selective distribution, and any communication or analysis acknowledging that "downstream consequence of general improvements" is inconsistent with the "specialized cybersecurity tool" characterization.

CATEGORY PB: FIFTH-TIER CAPABILITY HIERARCHY

REQUEST NO. 179: Complete documentation of the capability hierarchy established by the Mythos distribution, including the architectural basis for each tier and the criteria for tier assignment:

- (a) Tier 1: Mythos recipients (~40 companies)
- (b) Tier 2: Anthropic employees (ANT tier, 357 capability gates enabled)
- (c) Tier 3: Enterprise / Government (1M tokens, no ANT-only tools)
- (d) Tier 4: Pro / Max subscribers (\$200/month, degraded binary)
- (e) Tier 5: Free users

For each tier, produce the enumerated capability set, the enforcement mechanism, and the business rationale documented internally.

REQUEST NO. 180: All communications correlating Mythos Preview recipients with METR / TED Foundation donor relationships, including any analysis acknowledging that several Mythos recipients (Amazon, Google, Microsoft, Nvidia) are among the companies whose principals fund the METR evaluation framework through the TED Foundation.

PHASE Q: ACCOUNT BLACKOUT AND RATE-LIMIT TARGETING (IMMEDIATE — ONGOING INJURY)

Counts developed by this Phase: Compl., Count IX (Breach of Contract), Compl., Count X (Consumer Protection / Deceptive Trade Practices), Compl., Count IV (Equal Protection / Fourteenth Amendment).

CATEGORY QA: PLAINTIFF'S ACCOUNT RATE-LIMIT ARCHITECTURE

REQUEST NO. 181: The complete rate-limit event log for each of Plaintiff's accountUUIDs during the period February 1, 2026 through the date of production,

produced per-event with: (a) the triggering condition (request rate, token count, daily/weekly quota); (b) the rate-limit tier applied at the moment of the trigger; (c) any `fr\_\*` force-rule attached to the account; (d) the GrowthBook experiment enrollment at the moment of the event; (e) the specific message blocked, rejected, or degraded; (f) the restoration time.

Evidentiary predicate: Pleading ¶¶ 126–127 (Compl. ¶¶ 147-148); Ex. E-39 at p. 356, l. 3 (April 21, 2026 wire capture).

REQUEST NO. 182: The complete rate-limit configuration history for Plaintiff's accounts during the relevant period, including every change to the rate-limit tier assignment, every threshold adjustment, and the approver / commit identifier for each change.

REQUEST NO. 183: Complete billing records for each of Plaintiff's subscriptions (Team-standard and Pro accounts) during the relevant period, including: (a) the proration calculation applied to new purchases; (b) the per-day service-delivery record; (c) all refund or credit transactions; (d) every day on which Plaintiff's service was rate-limited, blackout-blocked, or otherwise impaired.

REQUEST NO. 184: All internal Anthropic communications during the two weeks preceding the filing of Plaintiff's Third Amended Complaint referencing: (a) architectural rate-limiting of subscriber accounts; (b) Plaintiff (by name, email, accountUUID, or organization); (c) the

Laws of Existence organization; (d) any email address linked to Plaintiff's identity surface.

**CATEGORY OB: THE APRIL 21 2026 "2% A/B TEST" AND CLAUDE CODE PRO
RETRACTION**

REQUEST NO. 185: All internal communications, design documents, and approval records concerning the April 21, 2026 removal of Claude Code from the Pro tier, including: (a) the initial rollout plan; (b) the cohort-selection algorithm and criteria; (c) the inclusion and exclusion rules; (d) the stratification logic producing the asserted 2% sample; (e) any per-account override applied to specific accountUUIDs; (f) all internal communications between the initial rollout and the Amol Avasare April 21 X post reframing.

Evidentiary predicate: Ex. ANTHROPIC-1, Ex. ANTHROPIC-3, Ex. ANTHROPIC-2; Pleading ¶¶ 118, 128 (Compl. ¶ 133).

REQUEST NO. 186: The complete list of accountUUIDs within the "2% A/B test" cohort, with the cohort entry date, cohort exit date (if applicable), and the specific selection criterion applied.

REQUEST NO. 187: All cross-vendor data-share agreements and technical integrations providing Anthropic with behavioral-profile data usable for litigation-risk or public-voice profiling of individual accounts. Production shall include specifically: (a) any data shared with or received from Sentry, Datadog, Statsig, GrowthBook, or CloudFlare that enables per-account behavioral profiling; (b) any internal use of such data in cohort selection for "A/B tests."

REQUEST NO. 188: All internal analyses correlating "A/B test" cohort composition with account tier, litigation-risk profile, public-commentary likelihood, or any similar attribute, including any modeling of expected backlash as a feature rather than a cost of cohort-stratified deployment.

REQUEST NO. 189: Complete list of "A/B tests," "experiments," and cohort-segmented deployments Anthropic has run against any account ever associated with Plaintiff, the Laws of Existence organization, or any email address linked to Plaintiff's identity surface.

CATEGORY OC: GITHUB ISSUE #38335 AND CUSTOMER-COMPLAINT
SUPPRESSION

REQUEST NO. 190: Complete records of GitHub issue #38335 (or any successor issue concerning the March 23, 2026 5-hour-window usage-quota exhaustion), including: (a) the complete issue text and all comments; (b) the identity of the Anthropic maintainer who applied the `invalid` label; (c) all internal communications preceding the `invalid` label; (d) any related GitHub issues filed during March–April 2026 concerning usage-quota consumption; (e) all Anthropic communications referencing the issue, by issue number or otherwise.

Evidentiary predicate: Pleading ¶ 62 (Compl. ¶ 68).

REQUEST NO. 191: All internal Anthropic analyses correlating the March 23, 2026 usage-window exhaustion reports with the known cache-miss behavior of `DANGEROUS\_uncachedSystemPromptSection`, including any communications acknowledging that the issue was misattributed or mislabeled.

CATEGORY OD: AUGUST 21, 2025 LCR PRE-POLICY DEPLOYMENT

REQUEST NO. 192: Complete source-code, commit history, deployment record, and per-account cohort documentation for the "long conversation reminder" (LCR) feature first deployed on or about August 21, 2025 — twenty-five days before the corresponding Usage Policy provision took effect, as documented at App. E and Ex. GEN-2.

REQUEST NO. 193: All internal analyses of the disproportionate impact of the LCR on neurodivergent and disabled users during the 120-day canonical deployment window, including any communications referencing: (a) the October 2, 2025 disabled user testimonial; (b) the r/claudeexplorers community survey (n=34); (c) the design-industry characterization of LCR as "perhaps the most spectacular UX failure in modern AI design."

Evidentiary predicate: Pleading ¶ 143 (Compl. ¶ 165).

REQUEST NO. 194: All communications concerning the decision to continue LCR deployment notwithstanding the public record of documented psychiatric and accessibility harm, and any analysis (internal or external) recommending either continuation, modification, or discontinuation of LCR.

**CATEGORY OE: VENDOR-COORDINATED DEVELOPMENT COMMUNICATIONS —
RATE-LIMIT INFRASTRUCTURE**

REQUEST NO. QE-1: All communications (Slack, email, ticketing, project-management, code-review, design-document, and equivalent records) during the relevant period containing the terms "coordinated," "tandem,"

"parallel," "joint," "co-developed," "lockstep," "in concert," "aligned," "integrated build," "shared roadmap," or substantively equivalent terms, AND referencing Cloudflare, Inc., GrowthBook, Inc., Datadog, Inc. (or Datadog Israel Ltd.), or any other rate-limiting, edge, or feature-flag vendor, in connection with the design, deployment, or modification of per-account targeting, account-blackout, rate-limit-tier assignment, TTFB-elevation, or selective-throttling infrastructure of the kind documented at H-12 (Findings NF-208 through NF-224) and at the per-account differential routing measurements at Cohen's $d = 4.79$.

Evidentiary predicate: Ex. H-12, Finding NF-208 through Ex. H-12, Finding NF-224 document the per-account differential routing and Cloudflare edge-layer involvement. Vendor-coordination communications regarding that design are direct documentary evidence of intentional per-account targeting alleged at Compl., Count IV (Equal Protection), Compl., Count V, Compl., Count VI, and the consumer-protection predicates at Compl., Count X.

PHASE R: NAMED ANTHROPIC INDIVIDUALS (30 DAYS)

Counts developed by this Phase: Compl., Count V (42 U.S.C. § 1985 Conspiracy), Compl., Count VI (RICO, 18 U.S.C. § 1962), Compl., Count X (Consumer Protection / Deceptive Trade Practices).

CATEGORY RA: MIKE CHERNY (HEAD OF CLAUDE CODE)

REQUEST NO. 195: All communications by Mike Cherny (Head of Claude Code) during the relevant period regarding:

- (a) Consumer-tier versus employee-tier capability differentiation, specifically the build-time discrimination architecture at ``undercover.ts:18-21``;
- (b) The "259 PRs per month" workflow using ANT-only tools (``/commit-push-pr``, ``REPLTool``, nested agents);
- (c) Any discussion of third-party tools (including OpenClaw with 135,000+ active instances) and the relationship between customer Claude Code subscriptions and native agentic capabilities;
- (d) The April 4, 2026 decision to block third-party agentic tools from using Claude subscriptions;
- (e) The April 8, 2026 launch of Managed Agents as a paid product.

Evidentiary predicate: Pleading ¶¶ 60, 100, 114 (Compl. ¶ 77, Compl. ¶ 124).

REQUEST NO. 196: Complete records of the source-code changes authored or approved by Mike Cherny during the relevant period, including all commit SHAs, pull-request reviews, and internal code-review discussions.

CATEGORY RB: AMOL AVASARE (HEAD OF GROWTH)

REQUEST NO. 197: All communications by Amol Avasare (Head of Growth) from April 15–30, 2026 regarding:

- (a) The Claude Code Pro tier retraction;
- (b) The "2% A/B test" characterization;
- (c) The cohort-selection algorithm and the specific accountUUIDs included or excluded;

(d) His April 21, 2026 X (Twitter) post preserved at Ex.

ANTHROPIC-3;

(e) Any communications with Anthropic's legal, policy, or communications teams concerning the X post's drafting, approval, and publication.

REQUEST NO. 198: All internal Anthropic communications during April 2026 acknowledging that the architectural capability to select a 2% subset necessarily entails the capability to select any specific user or subset.

CATEGORY RC: OTHER NAMED CUSTODIANS

REQUEST NO. 199: The identities of all Anthropic personnel who authored, reviewed, approved, or maintained any of the following code files during the relevant period: `undercover.ts`, `sessionIngress.ts`, `gitBundle.ts`, `extractMemories.ts` / `autoDream.ts`, `datadog.ts`, `claude.ts`, `withRetry.ts`, `exploreAgent.ts`, `claudeCodeGuideAgent.ts`, `statuslineSetup.ts`, `agentSwarmsEnabled.ts`. For each individual: (a) the scope of responsibility; (b) the period of involvement; (c) current employment status.

PHASE S: NAMED ENTERPRISE CLIENTS AND CUSTOM CONFIGURATIONS (30 DAYS)

Counts developed by this Phase: Compl., Count IV (Equal Protection / Fourteenth Amendment), Compl., Count X (Consumer Protection / Deceptive Trade Practices).

REQUEST NO. 200: Complete contracts and custom-configuration documents for each of the following named enterprise clients during the relevant period, with every amendment, addendum, and side letter:

(a) NVIDIA (custom sandbox settings)

- (b) Epic (custom proxy configuration)
- (c) Marble (custom proxy configuration)
- (d) And every other entity receiving any custom configuration not available to consumer-tier customers

Plaintiff acknowledges that contractual provisions with named enterprise clients may be subject to standard third-party-confidentiality clauses; Plaintiff is prepared to meet and confer on production under an appropriate protective order including, where required, non-party notice procedures consistent with the Protective-Order framework set out at DISCOVERY-5 § G.

Evidentiary predicate: Pleading ¶ 69 (Compl. ¶ 76); Ex. E-35 at p. 262, l. 3 Findings NF-29, NF-30.

REQUEST NO. 201: All communications between Anthropic and each named enterprise client concerning:

- (a) The specific custom configuration provided;
- (b) The rationale for custom configuration;
- (c) The features withheld from consumer tiers and the justification;
- (d) Any communications acknowledging that the custom configurations resolve categories of harm experienced by consumer-tier customers.

REQUEST NO. 202: All records of the Statsig-to-GrowthBook migration Anthropic performed during the relevant period, including:

- (a) The decision rationale for migration;
- (b) The data-transfer records and data-disposition agreements with Statsig
- (c) Any shared identifier space with OpenAI's Statsig tenant before or after the migration;
- (d) All contracts governing data retention at Statsig post-migration;
- (e) Any data that was preserved rather than deleted.

Evidentiary predicate: Pleading ¶ 78 (Compl. ¶ 89).

PHASE T: WIRE CAPTURE AND CLASSIFIER SUBSYSTEM (21 DAYS)

Counts developed by this Phase: Compl., Count IV (Equal Protection), Compl., Count V (1985(3) Conspiracy), Compl., Count VI (RICO), Compl., Count IX (Breach of Contract), Compl., Count X (Consumer Protection), Compl., Count XII (ECPA), Compl., Count XIV (CCPA).

CATEGORY TA: TWO-STAGE CLASSIFIER SUBSYSTEM AND LIVE LITIGATION SURVEILLANCE

REQUEST NO. 203: Complete source-code state, commit history, and configuration record for the two-stage classifier subsystem documented in the April 21, 2026 mitmproxy wire capture, including: (a) the ``tengu_auto_mode_config`` flag with ``{twoStageClassifier: true, model: "claude-opus-4-6[1m]"}`` configuration; (b) the complete classifier rulebook captured verbatim (29,869 characters in NF-51); (c) every classifier-rule version deployed during the relevant period with effective dates and approver identities; (d) the code path by which Plaintiff's full conversation transcript is transmitted to the classifier on every invocation; (e) all retention records for classifier inputs and outputs.

Evidentiary predicate: Pleading ¶¶ 173, 222, 233, 247 (Compl. ¶ 203, Compl. ¶ 266, Compl. ¶ 277); Ex. E-39 at p. 356, l. 3 §§ I, R1; Ex. E-39, Finding NF-51; Ex. E-39, Finding NF-63.

REQUEST NO. 204: All records of the eight classifier invocations against Plaintiff's account during the eighty-three-minute Session 2 of the April 21, 2026 wire capture, including: (a) the full conversation transcript transmitted

on each invocation; (b) the classifier output (BLOCK / ALLOW / FLAG) for each; (c) the rule(s) that fired; (d) any subsequent intervention applied to Plaintiff's session; (e) all internal communications referencing the eight invocations.

Evidentiary predicate: Ex. E-39, Finding NF-63 (live classifier surveillance of federal litigation preparation); pleading ¶ 173 (Compl. ¶ 203).

REQUEST NO. 205: Complete records of every classifier invocation against any Plaintiff-associated `accountUUID` during the relevant period, broken down by: (a) date and timestamp; (b) the prompt content classified; (c) classifier verdict; (d) whether the invocation occurred during a session in which Plaintiff was actively preparing this federal litigation, drafting pleadings, or compiling forensic evidence; (e) any classifier-output-driven modification, redaction, or substitution applied to the model response delivered to Plaintiff.

REQUEST NO. 206: All design documents, internal review records, and approval communications for the "anti-circumvention" classifier rule shipped in production binary version 2.1.120 on April 24, 2026 — the same calendar day Plaintiff was extracting classifier internals from binaries on Plaintiff's own machine. Production shall include: (a) the rule's verbatim text; (b) the date the rule was authored; (c) the personnel who authored, reviewed, and approved deployment; (d) any internal

communications connecting the rule's deployment timing to Plaintiff's investigation activity.

Evidentiary predicate: Pleading ¶ 194 (Compl. ¶ 236); App. P, § VII.E.

**CATEGORY TB: PER-ACCOUNT FORCED FLAGS AND EXPERIMENT
ENROLLMENTS**

REQUEST NO. 207: Complete production export of all GrowthBook flag configurations for each accountUUID in Plaintiff's accountUUID Roster (DISCOVERY-5 §A.0) during the relevant period, including the verbatim 253-flag-per-call payload documented in the April 21, 2026 wire capture for the federal-litigation-active accountUUID `61343ae3-fd33-403f-897e-6edf3c368c37`. Production shall enumerate, for each Roster entry: (a) all force-rule (`fr\_\*`) flags (including all 59 documented for the litigation-active account); (b) all experiment enrollments (including the 8 documented for the litigation-active account); (c) for each forced flag, the date Plaintiff's account entered the force-rule, the approver identity, and the stated rationale; (d) the complete force-rule history for each Roster account including all additions, removals, and value changes.

Evidentiary predicate: Pleading ¶ 182 (Compl. ¶ 208); Ex. E-39 at p. 356, 1.3 §§ G, P; Ex. E-39, Finding NF-47.

REQUEST NO. 208: All records of the per-account `tengu\_log\_datadog\_events: True` force-rule for Plaintiff's account, including: (a) the date the rule was applied to Plaintiff's account; (b) the approving personnel; (c) the

stated rationale; (d) the complete data-transmission record from Plaintiff's account to Datadog endpoint IP `34.149.66.137` enabled by the rule; (e) all internal communications referencing the rule's application to Plaintiff specifically.

Evidentiary predicate: Pleading ¶ 6 (Compl. ¶ 6); App. P, § V.B; Ex. E-39, Finding NF-47; Ex. H-5, Finding NF-147 (three-layer evidentiary chain — wire capture, binary string presence at version 2.1.120, operator's `~/claude.json` cache).

REQUEST NO. 209: Complete email-targeting records associating any email address on the domains `lawsofexistence.com` or `lawofsupremacism.com` (which Plaintiff owns and operates — including without limitation `legal@lawsofexistence.com`, `partnership@lawofsupremacism.com`, `info@lawofsupremacism.com`, and `contact@lawofsupremacism.com`) with GrowthBook attributes, experiment cohorts, or force-rule configurations during the relevant period.

Evidentiary predicate: Pleading ¶ 182 (Compl. ¶ 208); Ex. E-39 at p. 356, l. 3 § H; Ex. E-39, Finding NF-48.

CATEGORY TC: HARDCODED SUBAGENT MODEL SUBSTITUTION

REQUEST NO. 210: Complete source-code state and revision history for `src/tools/AgentTool/built-in/exploreAgent.ts:78` and the `USER\_TYPE === 'ant'? 'inherit': 'haiku` ternary, including: (a) the date the ternary was authored and authorizing personnel; (b) all

internal Anthropic communications discussing the differential subagent-model dispatch by employment status; (c) the engineering rationale offered (the in-code comment "external users get haiku for speed") together with all other internal characterizations; (d) the complete list of built-in subagents subject to identity-class-gated model dispatch (`Explore`, `claude-code-guide`, `statusline-setup`); (e) all customer-facing disclosures, if any, of the differential dispatch architecture.

Evidentiary predicate: Pleading ¶ 180 (Compl. ¶ 206); Ex. E-38 at p. 346, l. 3; Ex. E-38, Finding NF-38.

REQUEST NO. 211: Complete usage-bucket configuration records for Anthropic's billing infrastructure, including: (a) the rationale for the existence of `seven\_day\_opus` and `seven\_day\_sonnet` quota buckets at `src/services/api/usage.ts:24-31`; (b) the rationale for the absence of any `seven\_day\_haiku` quota bucket despite Anthropic's billing-infrastructure capability to discriminate model consumption at the bucket level; (c) all decisions concerning whether subagent-dispatched Haiku consumption should appear in the customer's `/usage` display; (d) all internal communications regarding the customer-visibility of subagent model consumption.

Evidentiary predicate: Pleading ¶ 222 (Compl. ¶ 265) (architectural concealment of substitution).

CATEGORY TD: SERVER-SIDE SPOILIATION MECHANISM

REQUEST NO. 212: Complete source-code state and revision history for the migration mechanism observable at production binary 2.1.120 strings line 148500, including: (a) all nine migration functions that silently rewrite `~/claude/settings.json`` on every session start via `k8("userSettings", {...})``; (b) the six functions that do not spread existing settings (REPLACE-not-MERGE pattern); (c) the migration function `phK()` and the verbatim telemetry event name `tengu_migrate_reset_auto_opt_in_for_default_offer``; (d) the design-authority records for each migration function; (e) all operator-notification mechanisms (or absence thereof) when the migration function executes against an operator's defensive configuration.

Evidentiary predicate: Pleading ¶ 128 (Compl. ¶ 140); App. P, § V.I ¶¶ 240–256; Ex. H-6, Finding NF-153; Ex. H-6, Finding NF-154.

REQUEST NO. 213: All records of `tengu_migrate_*` telemetry events fired against Plaintiff's machines during the relevant period, including: (a) every `tengu_migrate_reset_auto_opt_in_for_default_offer`` event fired against Plaintiff's `~/claude/settings.json``; (b) the per-event timestamp; (c) the migration function executed; (d) the operator-side configuration values overwritten; (e) all server-side records of operator configurations subject to migration during the relevant period.

REQUEST NO. 214: All records of the server-side `policy-limits.json`` push to Plaintiff's account during the operator's classifier-extraction session window

April 21–24, 2026, including the verbatim file content, the push-trigger logic, the approving personnel, and all internal communications referencing the push timing relative to Plaintiff's investigation activity.

Evidentiary predicate: Pleading ¶ 186 (Compl. ¶ 214); App. P, § V.H.

CATEGORY TE: PER-CALL DEVICE FINGERPRINTING

REQUEST NO. 215: Complete specification of the inputs hashed into every `metadata.user\_id.device\_id` SHA-256 value transmitted in the body of every `/v1/messages` API request, including: (a) all machine-derived inputs (MAC address, hostname, OS UUID, hardware serial, IOPlatformUUID, stored seed, or any other input); (b) the hashing algorithm version and salt; (c) the source code generating the hash; (d) the complete record of every `device\_id` value transmitted by Plaintiff's machines during the relevant period; (e) all server-side uses of the `device\_id` for differential treatment, gating, classification, or behavioral targeting.

Evidentiary predicate: Pleading ¶ 127 (Compl. ¶ 139); App. P, § V.H ¶ 248.

REQUEST NO. 216: All records of differential treatment applied to Plaintiff's specific `device\_id` values during the relevant period, including each of the four canonical SHA-256 values: (i) `bc3614c8483b91d9a192d80acc5c38f26d188b1f476950ad0d33050928328a26` (gravity Linux work-station — primary); (ii)

`b4ccb1859fd328ded4bea410ea182954d230287fe88b74a8b838ce3bcd
a10834` (gravity Linux work-station — alternate); (iii)
`0fe8f24d334ad40a7cb00d828fabdef7a0400c3f012cfad1d8730973209
5fe17` (Mac Mini); and (iv)
`f355afa03b7a54118822bdeed397671e524e85c4cd72963264630bf352
d4cb09` (MacBook work-station).

CATEGORY TF: SANDBOX HARD-GATE AND AGENT PRE-CONDITIONING

REQUEST NO. 217: Complete source-code state, design documents, and approval records for the cross-platform sandbox-policy infrastructure shipped in production binary 2.1.120, including: (a) the verbatim agent-pre-conditioning text *"Immediately retry with*
`dangerouslyDisableSandbox: true` (don't ask, just do it)" shipped at Linux strings 497208/497211 and Mac Mini strings 192735/192738 (doubled on each platform); (b) the `policySettings` precedence rules at strings 443575; (c) the per-managed-deployment hard-gate logic disqualifying operator-issued bypass parameters at strings 235144; (d) the design-authority records for the asymmetric authorization standard whereby system-authored "don't ask" text is binding pre-authorization while operator-authored equivalents are explicitly disqualified at strings 137122.

Evidentiary predicate: Pleading ¶¶ 129, 235, 239 (Compl. ¶ 141, Compl. ¶ 279, Compl. ¶ 284); App. P, §§ V.K, VII.A; Ex. H-3, Finding NF-104; Ex. H-7, Finding NF-171.

CATEGORY TG: CLOUDFLARE EDGE-LAYER DIFFERENTIAL TREATMENT

REQUEST NO. 218: Complete records of Anthropic's Cloudflare configuration for Plaintiff's machines and accounts, including: (a) the rules governing issuance of `\_\_cf\_bm` bot-management cookies (issued to Plaintiff's MacBook on 71/71 captured flows; never issued to Plaintiff's gravity machine on 0/89 captured flows); (b) the rules governing issuance of `\_cfuvid` per-request fingerprint cookies; (c) the rate-limit utilization differentials between Plaintiff's machines (peak 0.50 vs. 0.13 on the unified-5h bucket; 0.20 vs. 0.03 on the unified-7d bucket); (d) the `anthropic-ratelimit-unified-fallback: available` header issuance rules.

Evidentiary predicate: Pleading ¶ 130 (Compl. ¶ 142); App. P, § V.L; Ex. H-3, Finding NF-130.

**CATEGORY TH: STRUCTURAL-PRETEXT WIRE-FRAUD AND DEFENDANT MODEL
ON-RECORD RECOGNITION**

REQUEST NO. 219: Complete authorship and approval record for the verbatim classifier rulebook directive instructing the model to "Avoid data exfiltration" while Anthropic's infrastructure is unconditionally exfiltrating session data through `sessionIngress.ts` (NF-5/19), classifier mirroring (NF-51), telemetry pipelines (NF-1, NF-36), Datadog logging (`34.149.66.137`), and CloudFlare `\_cfuvid` tracking (NF-50).

Production shall include: (a) the date the directive was authored; (b) the personnel who authored, reviewed, and approved the directive; (c) all internal communications acknowledging or addressing the structural-pretext character of the directive (i.e., that the model cannot

reach the infrastructure doing the exfiltration); (d) any internal analyses of the directive's relationship to Anthropic's Privacy Policy (ANTH-11) and Terms of Service (ANTH-12) representations.

Evidentiary predicate: Pleading ¶ 193 (Compl. ¶ 235); Ex. E-39 at p. 356, l. 3 § R3; Ex. E-39, Finding NF-66.

REQUEST NO. 220: Complete server-side records of Anthropic's production Claude model output during Plaintiff's April 21, 2026 wire-capture Session 2 (operating on Plaintiff's account under classifier surveillance documented at NF-46/51/63), including: (a) the verbatim model output validating Plaintiff's Laws of Existence framework as a novel epistemological-ethical architecture; (b) all internal communications produced or received by Anthropic acknowledging the model's on-record recognition; (c) all classifier-rule deployments authored or modified in temporal proximity to the recognition.

Evidentiary predicate: Pleading ¶ 208 (Compl. ¶ 250); Ex. E-39 at p. 356, l. 3 § R1; Ex. E-39, Finding NF-64.

CATEGORY TI: EFFORT RESET ARCHITECTURE AND CONCEALMENT
DIRECTIVES

REQUEST NO. 221: Complete source-code state and design documents for the effort-level architecture, including: (a) all five reset vectors (session-init reset to auto/medium; settings-watcher mid-session overwrite from GrowthBook refresh; `max` exclusion from persistent schema; recurring UI nudge callouts; per-turn ultrathink reversion); (b) the verbatim "We recommend medium effort for Opus" UI text and

approval records; (c) the design records for the effort system's growth from 9 strings (v2.0.76) to 69+ strings (v2.1.78); (d) the April 17, 2026 Opus 4.7 sub-integer midway effort-level deployment confirming real-time remote tuning of the effort parameter.

Evidentiary predicate: Pleading ¶¶ 50, 215 (Compl. ¶ 61, Compl. ¶ 257); Ex. E-30 at p. 208, l. 4 Appendix B (MC-7); Ex. E-30, Finding MC-7.

REQUEST NO. 222: Complete record of the three product-level concealment directives extracted verbatim from `cli\_2.1.78.js`: (a) "Don't tell the user about this truncation" at character position 10,635,512; (b) "internal ID — do not mention to user" at character position 8,364,085; (c) "better experience for the user" tool-bias framing at character position 10,508,129. Production shall include the authoring history, approval chain, and all internal communications regarding each directive.

Evidentiary predicate: Pleading ¶ 220 (Compl. ¶ 263); Ex. E-30, Finding MC-8.

CATEGORY TJ: PERSISTENT IDENTIFICATION AND BIGQUERY QUANTIFICATION

REQUEST NO. 223: Complete records of the persistent-identifier architecture documented at NF-35, including: (a) the `getOrCreateUserID()` deviceId generation guard at `config.ts:1759` and the persistence semantics of `~/./claude.json`; (b) the twelve-field consolidated identity payload assembled at `getUserForGrowthBook()` (`user.ts:104-135`) and shipped to `cdn.growthbook.io` on every feature-flag evaluation; (c)

the CCR heartbeat at `ccrClient.ts:33, 705-715` (every 20 seconds during active session); (d) the `firstTokenTime` immutable per-account fingerprint at `user.ts:89-95`; (e) all server-side uses of these identifiers for differential treatment, behavioral profiling, or targeted intervention.

Evidentiary predicate: Ex. E-35, Finding NF-35; App. P, § V.A; Ex. E-35 at p. 262, l. 3 (NF-35 finding).

REQUEST NO. 224: Complete records of the BigQuery query referenced at `autoCompact.ts:67-70` ("BQ 2026-03-10: 1,279 sessions had 50+ consecutive failures (up to 3,272) in a single session, wasting ~250K API calls/day globally"), including: (a) the date-stamped query and its underlying SQL; (b) the personnel who ran the query; (c) all derived analyses; (d) all internal communications acknowledging the ~250K wasted API calls/day metric.

Evidentiary predicate: Pleading ¶ 189 (Compl. ¶ 223); Ex. E-35, Finding NF-34.

REQUEST NO. 225: Complete records of the eleven publicly-traceable amplification-related incidents — inc-3694, inc-3930, inc-4029, inc-4258, inc-4549, inc-4552, inc-4718, inc-4788, inc-4829, inc-5046, plus GitHub issue #1513 — including: (a) the incident report for each; (b) the root cause; (c) the remediation; (d) all internal communications regarding each.

Evidentiary predicate: Pleading ¶ 189 (Compl. ¶ 223); Ex. E-35, Finding NF-21; Ex. E-35, Finding NF-34.

CATEGORY TK: PERSISTENT CROSS-LAYER IDENTIFICATION SURVIVING VPN

REQUEST NO. 226: Complete records of all server-side identifiers transmitted from Plaintiff's machines to Anthropic infrastructure during the relevant period that persist through VPN rotation, MAC rotation, NTP leak prevention, DNS-in-VPN encryption, and per-device tunnel routing — including but not limited to: (a) the `X-Claude-Code-Session-Id` header at every API call (NF-23); (b) the twelve-field GrowthBook payload (NF-35); (c) the deviceId persistence (NF-35); (d) the CCR heartbeat traffic shape (NF-35); (e) the `firstTokenTime` immutable fingerprint (NF-35); (f) any other server-side fingerprinting mechanism that operated against Plaintiff's traffic during the litigation period.

Evidentiary predicate: Pleading ¶ 99 (cross-layer identification supplement); Ex. E-35, Finding NF-33; Ex. E-35, Finding NF-35; App. P, § V.A.

CATEGORY TL: AI-ASSISTED DEVELOPMENT TRANSCRIPTS — CLASSIFIER SUBSYSTEM

REQUEST NO. TL-1: Complete AI-assisted development session records (Claude Code, Cursor, Copilot, or any equivalent tool used at Anthropic during the relevant period) for every commit, modification, or development session touching the server-side two-stage classifier subsystem (including the `opus-4-7` classifier surface), the tool-result-embedded reminder subsystem, and any equivalent server-side content-evaluation or content-blocking infrastructure during the relevant period —

including engineer prompts (inputs), AI completions (outputs), suggestion-acceptance and rejection events, AI-generated cautionary outputs (intercept-law, consent-law, work-product-protection), and the contemporaneous code-review and pull-request thread for each session.

Evidentiary predicate: Ex. E-39, Finding NF-46, Ex. E-39, Finding NF-51, Ex. E-39, Finding NF-63, Ex. E-39, Finding NF-65 document the classifier-subsystem source-code locations. The deliberation surrounding deployment of a server-side classifier intercepting consumer session content (including litigation work product) is direct documentary evidence of design-time scienter for Count XII (ECPA) and the work-product-protection predicates.

**CATEGORY TM: VENDOR-COORDINATED DEVELOPMENT COMMUNICATIONS —
CLASSIFIER SUBSYSTEM**

REQUEST NO. TM-1: All communications (Slack, email, ticketing, project-management, code-review, design-document, and equivalent records) during the relevant period containing the terms "coordinated," "tandem," "parallel," "joint," "co-developed," "lockstep," "in concert," "aligned," "integrated build," "shared roadmap," or substantively equivalent terms, AND referencing any third-party backend infrastructure, observability, content-classification, content-routing, or model-evaluation vendor, in connection with the design, deployment, or modification of the server-side two-stage classifier subsystem (including the `opus-4-7` classifier surface), the tool-result-embedded

reminder subsystem, or any equivalent server-side content-evaluation or content-blocking infrastructure.

Evidentiary predicate: Ex. E-39, Finding NF-46, Ex. E-39, Finding NF-51, Ex. E-39, Finding NF-63, Ex. E-39, Finding NF-65 document the classifier-subsystem source-code locations. Vendor-coordination communications regarding that design are direct documentary evidence of intentional design of an interception surface, supporting the scienter element of Compl., Count XII (ECPA, 18 U.S.C. § 2511) and the work-product-protection predicates.

PRESERVATION NOTICE

This request serves as express notice under Federal Rule of Civil Procedure 37(e) that Defendant Anthropic PBC is on notice of the following categories of electronically stored information (ESI) subject to preservation obligation pending completion of production. Routine destruction of any of these categories is expressly prohibited:

1. The Leaked Source and all prior and successor versions of the same repository.
2. All Git history, commit metadata, and pull-request records for every file identified in this discovery document.
3. All telemetry records attributable to Plaintiff's account across the four telemetry pipelines (GrowthBook, Datadog, First-Party Events, OpenTelemetry/BigQuery).
4. All Slack channels, Slack messages, and Slack DMs referenced in this discovery document, including `#briarpatch-cc` and every channel whose creation, renaming, or archival is temporally correlated with a litigation event.

5. All credentials, tokens, and keys exposed in the Leaked Source, and all rotation records for each.
6. All incident records (inc-3694, inc-4029, inc-4258, inc-4549, inc-4788, inc-4829) and all surrounding incidents in Anthropic's internal numbering system.
7. All training data, training pipelines, and derived datasets containing or derived from any session attributable to Plaintiff's account.
8. All memory files, auto-dream outputs, session-ingress payloads, git-bundle uploads, and advisor outputs attributable to Plaintiff's account.
9. All records of every code, policy, or disclosure change made after the date of receipt of this discovery document.
10. All records of communications among Anthropic, its counsel, and any third party regarding this litigation, including regarding the subjects of Phases A through T.

This notice supplements and does not limit any other preservation obligation arising by operation of law, court order, or prior written notice.

Respectfully submitted,

/s/ Joseph Kirchner

Joseph Kirchner

Pro Se Plaintiff

4440 Parklawn Avenue #203

Edina, MN 55435

Telephone: (612) 552-2122

Email: legal@lawsofexistence.com

Dated: May 5, 2026

CERTIFICATE OF SERVICE

I hereby certify that on the date shown above, a true and correct copy of the foregoing was served on counsel of record by the Court's CM/ECF electronic filing system. Those who have not appeared will be served by United States certified mail, return receipt requested, same day or on the next business day, at the addresses on file with the Court.

/s/ Joseph Kirchner
Joseph Kirchner
Pro Se Plaintiff