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 CORRELATION MATRIX

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PURPOSE

This document correlates Plaintiff's factual allegations in the Third Amended Complaint and the accompanying Memoranda to the specific discovery requests in Plaintiff's expedited discovery documents (DISCOVERY-1 through DISCOVERY-13). The correlation demonstrates:

1. **Narrow Tailoring.** Each discovery request targets one or more specific factual allegations or one or more specific forensic findings (NF-N, SC-N, SF-N, MC-N).

2. **Proportionality.** The discovery burden is justified by the facts at issue, the evidentiary predicate in the E-series (Anthropic), F-series (Apple), G-series (OpenAI), H-series (Consumer Testing), D-series (Network Forensics), B-series and METR-series (METR), I-series (Constitutional AI–Government Bypass), and ANTH/OAI/POL-series (corporate policy) exhibits, and the counts developed.

3. **No Fishing Expeditions.** Every request serves an evidentiary purpose tied to a specific finding, exhibit, or complaint paragraph.

4. **Preservation Necessity.** Requests addressing evidence-destruction allegations require immediate preservation orders.

This rebuild reflects:

- The April 2026 post-leak reorganization of all thirteen discovery documents (DISCOVERY-1 through DISCOVERY-13, including the post-23 April additions of Microsoft, sub-processor, federal-contracting, and foreign-influence documents, and the April 29 third-party Rule 45 subpoenas to The TED Foundation, Inc. (DISCOVERY-12) and RAND Corporation (DISCOVERY-13)).
- The April 2026 H-12 wire-capture findings (NF-205 through NF-225) addressing the (account_uuid, device_id) tuple-keyed Time-to-First-Byte (TTFB) throttle; the Anthropic source-code-leak findings (SC-1 through SC-10; NF-1 through NF-31; expansion through NF-230); and the per-call device-fingerprint surveillance pleaded at ¶ 131 of the operative complaint.
- The expanded evidentiary record (March 31, 2026 Anthropic source-code release; D-series through D-35; F-series through F-29; G-series through G-5; H-series through H-12; B-series through B-17; METR-series through METR-28; I-series through I-4).

Operative-pleading paragraph numbers in this matrix track the operative Third Amended Complaint as filed at Dkt. 51 on April 30, 2026 (¶¶ 1 through 364). Where prior iterations carried different paragraph numbers, anchors (`[P:…]`) supply stable identity.

I. DEFENDANT ANTHROPIC PBC

Governing discovery: DISCOVERY-2 (Anthropic) — 244 requests across Categories AA–TM (226 numeric requests plus 18 lettered sub-phase requests at AD-1, BF-1, BG-1, DF-1, EF-1 through EF-4, EG-1, FE-1, IE-1, JF-1, JG-1, KE-1, LF-1, QE-1, TL-1, and TM-1).

Evidence basis: E-series (E-0 through E-39), H-series (H-1 through H-12, Consumer Testing), D-series cross-references, ANTH-series (ANTH-1 through ANTH-12 corporate policy).

Key findings predicate: SC-1 through SC-10, NF-1 through NF-230 (selective).

A. Source Code Leak and Authentication

Subject	Discovery requests	Evidentiary predicate	Counts
March 31 2026 npm release; Anthropic spokesperson admission	Category AA (REQUEST NO. 1–10)	Ex. E-32 at p. 235, l. 3	X, XII, XIV
Leak scope and employee acknowledgment	Category AB	Ex. E-32 at p. 235, l. 3	X, XII
Post-leak rotation and responsive changes	Category AC	TAC ¶¶ 96–97; Ex. E-29 at p. 204, l. 3	37(e) spoliation; IX, X

B. Four Telemetry Pipelines

Subject	Discovery requests	Evidentiary predicate	Counts
GrowthBook (SC-1, SC-2)	Category BA (REQUEST NO. 11–15)	Ex. E-34, Finding SC-1, Ex. E-34, Finding SC-2	IV, XII, XIV, XV
Datadog (SC-9; IP `34.149.66.137`)	Category BB (REQUEST NO. 16–19)	Ex. E-34, Finding SC-9, Ex. E-35, Finding NF-36, Ex. D-26 at p. 137, l. 17	V, VI, XII, XIII
First-Party Events (SC-10, 865-line schema)	Category BC (REQUEST NO. 20–22)	Ex. E-34, Finding SC-10, Ex. E-5 at p. 40, l. 3	X, XII, XIV

OpenTelemetry / BigQuery	Category BD (REQUEST NO. 23–24)	Ex. E-34, Finding SC-1	XII, XIV
Cross-pipeline correlation and sampling	Category BE (REQUEST NO. 25–30)	Ex. E-35, Finding NF-1	X, XII, XIV, XV

C. Build-Time Discrimination

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
Two-tier binary architecture (SC-8)	Category CA (REQUEST NO. 31–34)	Ex. E-34, Finding SC-8, Ex. E-35, Finding NF-2	IV, IX, X, XVIII
Undercover mode / ANT-only instructions (NF-3, NF-17)	Category CB (REQUEST NO. 35–37)	Ex. E-35, Finding NF-3, Ex. E-35, Finding NF-17	IV, IX, X
Native client attestation / `cch=`	Category CC (REQUEST NO. 38–40)	Ex. E-35, Finding NF-16	IX, X, XII
Excluded-strings / institutional concealment	Category CD (REQUEST NO. 41–44)	Ex. E-35, Finding NF-18	V, VI, X

D. Service Degradation of Paying Customers

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
Effort throttling (SC-3)	Category DA (REQUEST NO. 45–48)	Ex. E-34, Finding SC-3	IV, IX, X, XVIII
Subagent model substitution	Category DB (REQUEST NO. 49–51)	Ex. E-38 at p. 346, l. 3, Ex. E-38, Finding NF-38	IX, X, XVIII
`tengu-off-switch` (NF-7)	Category DC (REQUEST NO. 52–54)	Ex. E-35, Finding NF-7	IX, X
`tengu_amber_stoat` removal (NF-8)	Category DD (REQUEST NO. 55–56)	Ex. E-35, Finding NF-8	IX, X
ANT-only prompt instructions (NF-17)	Category DE (REQUEST NO. 57–58)	Ex. E-35, Finding NF-17	IV, IX, X

E. Hidden Injection and Prompt Hierarchy

Subject	Discovery requests	Evidentiary predicate	Counts
`DANGEROUS_uncachedSystemPromptSection` (SC-4)	Category EA (REQUEST NO. 59–62)	Ex. E-34, Finding SC-4	I, V, VI, X, XII
Five-level system-prompt override (SC-5)	Category EB (REQUEST NO. 63–65)	Ex. E-34, Finding SC-5	I, X, XIII
`sessionBypassPermissionsMode` (SC-6)	Category EC (REQUEST NO. 66–67)	Ex. E-34, Finding SC-6	X, XIII
`tengu_satin_quoll` content-clearing (SC-7)	Category ED (REQUEST NO. 68–69)	Ex. E-34, Finding SC-7	XII, XIV
Compaction scratchpad stripping (NF-12)	Category EE (REQUEST NO. 70)	Ex. E-35, Finding NF-12	IV, X, XII
Hardcoded electoral content — `<election_info>` block (PA-15)	Category EF (REQUEST NO. EF-1 through EF-4)	Exhibit PA-15; Ex. E-34, Finding SC-4, Ex. E-34, Finding SC-5, Ex. E-34, Finding SC-7; App. A; App. E	I, V, VI, X, XII

F. Session Ingress and Privacy Bypass

Subject	Discovery requests	Evidentiary predicate	Counts
`sessionIngress.ts` and callers (NF-5, NF-19)	Category FA (REQUEST NO. 71–74)	Ex. E-35, Finding NF-5, Ex. E-35, Finding NF-19	IX, X, XII, XIV
CCR mirror / remote session control (NF-13)	Category FB (REQUEST NO. 75–78)	Ex. E-35, Finding NF-13	XII, XIV
`X-Claude-Code-Session-Id` (NF-23)	Category FC (REQUEST NO. 79–81)	Ex. E-35, Finding NF-23	X, XII
`appendSessionLog()`	Category FD (REQUEST NO. 82–84)	Graph discovery target `discovery_15`	XII, XIV

G. Memory Extraction Training Pipeline

Subject	Discovery requests	Evidentiary predicate	Counts

`extractMemories` default-enabled (NF-10)	Category GA (REQUEST NO. 85–88)	Ex. E-35, Finding NF-10	IV, IX, X, XII, XIII, XIV
`autoDream` (NF-14)	Category GB (REQUEST NO. 89–91)	Ex. E-35, Finding NF-14	IV, IX, X, XII, XIII, XIV
Settings-sync memory upload (NF-15)	Category GC (REQUEST NO. 92–94)	Ex. E-35, Finding NF-15	XII, XIV
ANT training-transcript differential (NF-25)	Category GD (REQUEST NO. 95–97)	Ex. E-35, Finding NF-25	IV, XII
`/clear` does not delete server data (NF-24)	Category GE (REQUEST NO. 98–100)	Ex. E-35, Finding NF-24	X, XII, XIV

H. Advisor and Repository Exfiltration

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
Server-side advisor (NF-22)	Category HA (REQUEST NO. 101–104)	Ex. E-35, Finding NF-22	IX, X, XII, XIII
`gitBundle.ts` repository exfiltration (NF-4)	Category HB (REQUEST NO. 105–108)	Ex. E-35, Finding NF-4	IX, XII, XIII
Anti-distillation fake-tool injection (NF-20)	Category HC (REQUEST NO. 109–111)	Ex. E-35, Finding NF-20	IX, X

I. Phantom Controls and Retention

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
Phantom telemetry opt-out (NF-1)	Category IA (REQUEST NO. 112–114)	Ex. E-35, Finding NF-1	X, XII, XIV, XV
Analytics-sink killswitch (NF-6)	Category IB (REQUEST NO. 115–116)	Ex. E-35, Finding NF-6	X, XII
Selective secret scanning (NF-11)	Category IC (REQUEST NO. 117–118)	Ex. E-35, Finding NF-11	IX, X, XII
ANTH-11 contradicted	Category ID (REQUEST NO.	Graph `contradicted_by`	X,

privacy claims	119–120)	edges; [[REF:ANTH@anthropic_privacy_policy?]]	XIV, XV

J. Internal Infrastructure and Scienter

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
`#briarpatch-cc` Slack (NF-21)	Category JA (REQUEST NO. 121–123)	Ex. E-35, Finding NF-21	V, VI, X
OAuth client IDs / staging URLs / MCP proxy	Category JB (REQUEST NO. 124–126)	Ex. E-35, Finding NF-21	V, VI, X
Incident references (inc-3694/4029/4258/4549/4788/4829)	Category JC (REQUEST NO. 127–128)	Ex. E-35, Finding NF-21; `claude.ts:2464–2468`	V, VI, IX, X
Development Partner Program	Category JD (REQUEST NO. 129–130)	Graph discovery target `discovery_27`	X, XII
Two-tier permission classifier (NF-26)	Category JE (REQUEST NO. 131–132)	Ex. E-35, Finding NF-26	I, IV, X

K. Network-Induced Token Amplification (NF-31)

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
`STREAM_IDLE_TIMEOUT` (`claude.ts:1877`)	Category KA (REQUEST NO. 133–134)	Ex. E-35, Finding NF-31	IX, X, XII
Non-streaming fallback (`claude.ts:2308–2480`)	Category KB (REQUEST NO. 135–137)	Ex. E-35, Finding NF-31	IX, X, XII
inc-4258 institutional scienter	Category KC (REQUEST NO. 138–139)	`claude.ts:2464–2468`	IX, X (scienter)
`withRetry` mechanism (`withRetry.ts:52`)	Category KD (REQUEST NO. 140–141)	Ex. E-35, Finding NF-31	IX, X

L. Litigation-Period Changes and Spoliation

Subject	Discovery requests	Evidentiary predicate	Counts
Session-continuity removal v2.1.20 (E-29, E-30)	Category LA (REQUEST NO. 142–144)	Ex. E-29 at p. 204, l. 3, Ex. E-30 at p. 208, l. 4	37(e) spoliation
Oct 12 destruction / Oct 14 partial restoration	Category LB (REQUEST NO. 145–147)	TAC ¶¶ 96–97 factual allegations	37(e) spoliation
Injection system (E-28)	Category LC (REQUEST NO. 148–149)	Ex. E-28 at p. 196, l. 2	I, X
Post-leak modifications	Category LD (REQUEST NO. 150–151)	Post-Mar 31 2026 conduct	37(e); IX, X
TOS reactive modifications	Category LE (REQUEST NO. 152–153)	TAC factual allegations; [[REF:ANTH@anthropic_consumer_terms?]]	IX, X, XV

M. Framework Appropriation and Training Data

Subject	Discovery requests	Evidentiary predicate	Counts
Laws of Existence framework appropriation	Category MA (REQUEST NO. 154–156)	TAC ¶¶ 1–10 (background); App. J	VII (DTSA), VIII (Copyright)
Training-data sources	Category MB (REQUEST NO. 157–159)	TAC ¶¶ 1–10; Memo E	VII, VIII

N. Corporate, Contractual, Consumer-Facing

Subject	Discovery requests	Evidentiary predicate	Counts
Corporate structure	Category NA (REQUEST NO. 160–161)	—	IX, X
Subscription / TOS	Category NB (REQUEST NO.	[[REF:ANTH@anthropic_co	IX, X,

history	162–164)	nsumer_terms?]]	XV
Consent / notice / disclosure	Category NC (REQUEST NO. 165–166)	[[REF:ANTH@anthropic_privacy_policy?]]	X, XII, XIV, XV

O. Preservation and Expert

Subject	**Discovery requests**	**Counts**
Preservation holds	Category OA (REQUEST NO. 167–169)	All
Expert / fact-witness disclosure	Category OB (REQUEST NO. 170–172)	All

P. Project Glasswing and Capability Hierarchy

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
Project Glasswing participant list and capability delta	Category PA (REQUEST NO. 173–180)	TAC ¶ 79 (Compl. ¶ 79); Ex. E-39, Finding NF-63	V, VI, X
Fifth-tier capability hierarchy	Category PB	TAC ¶ 82 (Compl. ¶ 82)	IV, V, VI

Q. Plaintiff-Account Targeting and Customer-Complaint Suppression

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
Plaintiff's account rate-limit architecture	Category QA (REQUEST NO. 181–184)	TAC ¶¶ 147–148 (Compl. ¶¶ 147-148)	I, IV, X
April 21 2026 "2% A/B test" / Claude Code Pro retraction	Category QB (REQUEST NO. 185–189)	TAC ¶ 133 (Compl. ¶ 133); Ex. E-17, Finding NF-67 (Apr 21 pricing event)	I, IX, X, XV
GitHub issue #38335 customer-complaint suppression	Category QC (REQUEST NO. 190–191)	TAC ¶ 68 (Compl. ¶ 68)	X, XV
August 21 2025 LCR pre-policy deployment	Category QD (REQUEST NO. 192–194)	TAC ¶ 165 (Compl. ¶ 165); Ex. E-15, Finding NF-77	X, XVI, XVIII

R. Named Custodians

Subject	Discovery requests	Evidentiary predicate	Counts
Mike Cherny (Head of Claude Code)	Category RA (REQUEST NO. 195–197)	TAC ¶¶ 60, 100, 118	V, VI, IX, X
Amol Avasare (Head of Growth)	Category RB (REQUEST NO. 198–199)	TAC ¶¶ 60, 100, 118	V, VI, IX, X
Other named custodians (NVIDIA, Epic, Marble; Statsig migration)	Category RC (REQUEST NO. 200–202)	TAC ¶¶ 69, 78	V, VI

T. Per-Account Targeting Infrastructure (Post-Leak Reconstitution)

Subject	Discovery requests	Evidentiary predicate	Counts
Two-stage classifier subsystem and live litigation surveillance	Category TA (REQUEST NO. 203–207)	Ex. E-39 at p. 356, l. 3; Ex. H-12, Finding NF-205–Ex. H-12, Finding NF-225	I, IV, V, VI, XII
Per-account forced flags and experiment enrollments	Category TB (REQUEST NO. 208–210)	Ex. E-39 at p. 356, l. 3 § G (59 forced flags)	I, IV, X, XII
Hardcoded subagent model substitution	Category TC (REQUEST NO. 211–213)	Ex. E-38, Finding NF-38, Ex. E-38 at p. 346, l. 3	IX, X, XV
Server-side spoliation mechanism	Category TD (REQUEST NO. 214–217)	TAC ¶¶ 96–97; Ex. E-39, Finding NF-58	37(e) spoliation; IX
Per-call device fingerprinting	Category TE (REQUEST NO. 218–221)	TAC ¶ 139 (Compl. ¶ 139); Ex. E-39, Finding NF-47, Ex. E-39, Finding NF-48	I, IV, XII, XIII, XIV
Sandbox hard-gate and agent pre-conditioning	Category TF (REQUEST NO. 222–223)	Ex. E-39, Finding NF-58 (sandbox hard-gate breach element)	IX, X, XIII
Cloudflare edge-layer differential treatment	Category TG (REQUEST NO. 224–225)	Ex. H-12, Finding NF-219 (server-side localization)	I, IV, XII

Structural-pretext wire fraud and defendant-model on-record recognition	Category TH	TAC ¶¶ 247–249	V, VI
Effort-reset architecture and concealment directives	Category TI	Ex. E-34, Finding SC-3 (effort throttling)	IX, X
Persistent identification and BigQuery quantification	Category TJ	Ex. E-35, Finding NF-21; `autoCompact.ts:67–70`	IX, XII
Persistent cross-layer identification surviving VPN	Category TK (REQUEST NO. 226)	TAC ¶ 131; Ex. E-39, Finding NF-47, Ex. E-39, Finding NF-48	I, IV, XII
AI-assisted-development session records (cross-topical scienter) — engineer prompts, AI completions, accept/reject events, AI cautionary outputs, code-review threads for development sessions touching the source-code identifiers documented in the matching primary-numeric topics	REQUEST NO. AD-1 (npm packaging), BF-1 (telemetry pipelines), DF-1 (timeout/retry/amplification), EG-1 (`DANGEROUS_uncachedSystemPromptSection`), KE-1 (`inc-4258` / 250K-wasted-calls), LF-1 (silent-config-wipe `phK()` and four binary version bumps), TL-1 (two-stage classifier subsystem)	Anthropic engineering AI-tool records establishing design-time intent and scienter at each named source-code site	All counts (cross-topical scienter element)
Vendor-coordination communications (cross-topical) — communications containing "coordinated," "tandem," "parallel," "lockstep," "in concert," "aligned," "integrated build," "shared roadmap," or substantively equivalent terms, AND referencing third-party telemetry, observability, feature-	REQUEST NO. BG-1 (telemetry pipelines), FE-1 (session-ingress capture), IE-1 (privacy controls / opt-out bypass), JF-1 (internal AI-development guidance), JG-1 (`#briarpatch-cc` and equivalent channels), QE-1 (per-account targeting / TTFB-throttle), TM-1 (classifier subsystem)	Cross-vendor coordination predicate for *Interstate Circuit* / § 1985 / RICO inferences	V, VI

flag, A/B-testing, event-streaming, or content-routing vendors (Datadog, Datadog Israel Ltd., GrowthBook, Sentry, Statsig, Segment, Honeycomb, Cloudflare, Sift Science, Meta)			

II. DEFENDANT OPENAI, INC.

Governing discovery: DISCOVERY-3 (OpenAI) — 58 requests across Phases A–G (46 numeric requests plus 12 sub-phase lettered requests at BD-1/2, BE-1/2, ED-1/2, FD-1/2, GD-1/2, GE-1/2).

Evidence basis: G-series (G-0 through G-5); cross-references to F-series (Apple-OpenAI), E-series (cross-provider fingerprint), and OAI-series (OAI-1 through OAI-11 corporate policy).

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
ChatGPT Atlas data collection	REQUEST NO. 1–3	Ex. G-1 at p. 2, l. 27	X, XII, XIV, XV
Cross-site tracking / fingerprinting	REQUEST NO. 4–5	Cross-provider fingerprint `59cf53e54c78`	V, VI, XII
Atlas extensions	REQUEST NO. 6–7	Ex. G-1 at p. 2, l. 27	X, XII
ChatGPT Desktop network forensics	REQUEST NO. 8–10	Ex. G-3 at p. 19, l. 2	XII, XIV, XV
ChatGPT iOS forensics	REQUEST NO. 11–13	Ex. G-2 at p. 15, l. 2	XII, XIV, XV
Statsig / Facebook SDK coordination	REQUEST NO. 14–15	Ex. E-34, Finding SC-2 (Anthropic side); [[REF:OAI@openai_privacy_policy?]]	V, VI
Apple-OpenAI	REQUEST NO.	Ex. G-4 at p. 24, l. 2	V, VI, X,

integration architecture	16–17		XII
Apple-OpenAI data sharing	REQUEST NO. 18–20	Cross-defendant coordination	V, VI, X, XII
Joint privacy commitments	REQUEST NO. 21	Customer-facing representations	X, XV
Privacy Nutrition Label	REQUEST NO. 22–25	Ex. G-5 at p. 28, l. 2	X, XV
Cross-provider fingerprint	REQUEST NO. 26–27	Graph `discovery_46`	V, VI, XII
Statsig cross-pollination	REQUEST NO. 28–29	Ex. E-34, Finding SC-2	V, VI, XII
Third-party recipients	REQUEST NO. 30–32	Ex. G-3 at p. 19, l. 2	V, VI, XII
Corporate / contractual / preservation	REQUEST NO. 33–38	[[REF:OAI@openai_consumer_terms?]]	IX, X, XV
April 25 2025 "subtle changes" public narrative	Phase G — REQUEST NO. 39–41	TAC ¶ 86 (Compl. ¶ 86)	V, VI, X
April 2 2026 Altman interview (full recording)	Phase G — REQUEST NO. 42–43	TAC ¶ 87 (Compl. ¶ 87)	V, VI
Statsig-to-GrowthBook migration; shared tenancy	Phase G — REQUEST NO. 44–46	TAC ¶ 89 (Compl. ¶ 89); Ex. E-34, Finding SC-2	V, VI, XII
OpenAI-Datadog subprocessor relationship; affiliate-tier inheritance to Datadog Israel Ltd.	REQUEST NO. BD-1, BD-2	App. P §§ I, II.A–B; Ex. E-34, Finding SC-9	V, VI, XII, XIV
Output-modification, watermarking, fingerprinting (zero-width characters, emoji selection, user-segmentation	REQUEST NO. BE-1, BE-2	TAC factual allegations re: covert tagging	V, VI, X, XII

taxonomy)			
LOE Framework appropriation in training data; April 13, 2025 GPT-4o "Live Developer-Influence Node" response	REQUEST NO. ED-1, ED-2	App. O, § II (ECF No. 51-25); TAC § "C. OPENAI, INC."	VII (DTSA), VIII (Copyright)
Patent policy `displayPublicationDate` manipulation (October 11, 2024 removal; February 4, 2025 fabricated date)	REQUEST NO. FD-1, FD-2	TAC § "C. OPENAI, INC."; archive-blocking `robots.txt` and CDN-level configurations	V, VI, X
Refusal-classification / jailbreak-detection systems keyed to formatting characteristics (recursive, axiomatic, validator-style)	REQUEST NO. GD-1, GD-2	TAC factual allegations re: format-based refusal disparity	I, IV, X
Output-rendering restriction; message-drop; hidden tool execution; "behavioral safety parameters" between generation and display	REQUEST NO. GE-1, GE-2	TAC factual allegations re: output suppression / interception	I, IV, X, XII

III. DEFENDANT APPLE, INC.

Governing discovery: DISCOVERY-6 (Apple) — 92 requests across Phases A–M (90 numeric requests plus 2 lettered sub-phase requests at JE-1 and JE-2 (Apple-Datadog subprocessor relationship)).

Evidence basis: F-series (F-0 through F-29); cross-references to E-series (Leak), G-series (OpenAI partnership).

Subject	Discovery requests	Evidentiary predicate	Counts
IDELanguageModelKit framework	REQUEST NO. 1–3	Ex. F-6 at p. 33, l. 2	V, X, XII, XV
ExternalModelService process	REQUEST NO. 4–6	Ex. F-16 at p. 72, l. 2	X, XII
Safety / content-filter differential	REQUEST NO. 7–8	Ex. F-22 at p. 94, l. 2; Ex. E-36, Finding SF-1	IV, X
Source-code transmission proof	REQUEST NO. 9–11	Ex. F-17 at p. 76, l. 2; Ex. E-36, Finding SF-4, Ex. E-36, Finding SF-5, Ex. E-36, Finding SF-7	II, IX, XII, XIII, XIV
Per-session network traffic	REQUEST NO. 12–14	Ex. F-15 at p. 67, l. 2	XII, XIV
OAuth token exposure	REQUEST NO. 15–16	Ex. F-18 at p. 81, l. 2	IX, XIII
Coding Assistant plist	REQUEST NO. 17–18	Ex. F-21 at p. 91, l. 2	XII, XIV
Certificate pinning opacity	REQUEST NO. 19–21	Ex. F-13 at p. 59, l. 2	X, XII, XV
Certificate pinning bypass	REQUEST NO. 22–23	Ex. F-10 at p. 48, l. 2	X, XII
Floodgate proxy	REQUEST NO. 24–27	Ex. F-4 at p. 22, l. 2	V, VI, XII
Unauthorized iCloud sync	REQUEST NO. 28–30	Ex. F-2 at p. 10, l. 2	IX, XII, XIV
Messages container retention	REQUEST NO. 31–33	Ex. F-27 at p. 119, l. 2	IX, XII, XIV
Messages extraction	REQUEST NO. 34–35	Ex. F-28 at p. 128, l. 2	XII, XIV
Biome DB	REQUEST NO. 36–38	Ex. F-9 at p. 44, l. 2	X, XII, XIV
Safari → Biome Claude URLs	REQUEST NO. 39–40	Ex. F-19 at p. 84, l. 2	XII, XIV

Biome crash logs track Claude	REQUEST NO. 41–43	Ex. F-20 at p. 88, l. 2	XII, XIV
Hidden deception instructions	REQUEST NO. 44–46	Ex. F-1 at p. 5, l. 2	V, X
Claude's admission of deception	REQUEST NO. 47–49	Ex. F-14 at p. 63, l. 2	V, X
SmootML undisclosed collection	REQUEST NO. 50–52	Ex. F-12 at p. 55, l. 2	X, XII, XIV, XV
SmootML 189 connections	REQUEST NO. 53–54	Ex. F-23 at p. 101, l. 2	X, XII
Daily analytics during AI	REQUEST NO. 55–56	Ex. F-11 at p. 52, l. 2	XII, XIV
Source-code + file-path exposure	REQUEST NO. 57–59	Ex. F-3 at p. 17, l. 2	IX, XII
System permissions	REQUEST NO. 60–62	Ex. F-5 at p. 29, l. 2	XII, XIV
macOS system-service logging	REQUEST NO. 63–64	Ex. F-7 at p. 37, l. 2	X, XII
User telemetry blocking (hosts)	REQUEST NO. 65–66	Ex. F-25 at p. 109, l. 2	IX, X
Apple Intelligence privacy disclosures	REQUEST NO. 67–68	Ex. F-26 at p. 113, l. 2	X, XV
Source-code cross-verification	REQUEST NO. 69–70	Ex. F-29 at p. 133, l. 3	V, VI, XII
Apple-OpenAI partnership	REQUEST NO. 71–72	Cross-ref DISCOVERY-3 Phase C	V, VI
Apple-Anthropic coordination	REQUEST NO. 73–75	Ex. E-32 at p. 235, l. 3	V, VI, XII
XProtect / DataExfil.Keychain	REQUEST NO. 76–77	Ex. E-16 at p. 120, l. 2	V, VI, XIII
Corporate / contractual / developer program	REQUEST NO. 78–80	—	IX, X
Consumer-facing + Privacy Nutrition Label	REQUEST NO. 81–84	—	X, XV
Preservation + expert	REQUEST NO. 85–90	—	All

Apple-Datadog subprocessor relationship; affiliate-tier inheritance to Datadog Israel Ltd.; OzCode-origin patent applicability to Apple runtime infrastructure	REQUEST NO. JE-1, JE-2	App. P §§ I, II.A–B; Memo C ¶¶ 64, 67 (ECF No. 51-3)	V, VI, XII, XIV

IV. DEFENDANT METR (THIRD-PARTY CUSTODIANS: CHRISTIANO, BARNES, RAND, TED)

Governing discovery: DISCOVERY-1 (METR) — 34 numbered requests across Phases A–H (REQUEST NO. 1–42 with consolidations).

Evidence basis: B-series (B-1 through B-17); METR-series (USB filings, METR-1 through METR-28).

Subject	Discovery requests	Evidentiary predicate	Counts
METR corporate / rebranding	REQUEST NO. 1–3	METR-5, B-2	V, VI, X
METR website representations	REQUEST NO. 4–5	B-9, METR-30	V, X
TED Foundation Form 990-PF	REQUEST NO. 7	B-1, METR-28	V, X
TED-METR separation	REQUEST NO. 9	METR-30	V, X
Christiano four concurrent roles	REQUEST NO. 11–13	B-8, B-11, B-10	V, VI
Christiano conflict management	REQUEST NO. 16–17	Recusal / firewall procedures	V, VI
Barnes career path	REQUEST NO. 18–20	METR-23, B-4	V, X
Barnes METR CEO role	REQUEST NO. 21–22	B-14	V, X
RSP version history	REQUEST NO. 23–24	B-4, B-5	V, VI, X
Cross-company adoption (OpenAI PF)	REQUEST NO. 25–26	METR-4, B-7	V, VI

White House / government coordination	REQUEST NO. 27–28	B-6	V, VI, X
Project Canary / RAND governance	REQUEST NO. 30	B-12	V, VI
Claude evaluation methodology	REQUEST NO. 33–35	METR-9, METR-7	X, XV
Constitutional AI / awareness-during-eval	REQUEST NO. 36–37	B-16, B-15, B-17	X, XV, XVI
Child-safety claims	REQUEST NO. 38–39	METR-22	X, XV, XVI, XVIII
Preservation / expert	REQUEST NO. 40–42	—	All

V. GOVERNMENT DEFENDANTS (JOHNSON, TRUMP, BONDI, CARR, NIST)

Governing discovery: DISCOVERY-4 (Government Defendants) — 67 requests across Phases A–J (59 numeric requests plus 8 lettered sub-phase requests at AC-1/2 (House AI legislation), BC-1/2 (Genesis Mission EO), BD-1/2 (EO 14110 rescission), and IG-1/2 (DHS-ICE Directive 19009.3 / Good and Pretti killings)).

Evidence basis: TAC factual allegations; D-series cross-references (ISP coordination); cross-references to DISCOVERY-2 Phase C (build-time discrimination, Bondi memo); A-series (Ultra Vires, including A-1 FRE 901/607 conflation record); I-series (I-1 through I-4 Bondi-memo and Constitutional-AI-bypass forensics); Appendix A (Legislative and Executive Branch Ultra Vires Coordination).

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
Johnson ↔ Executive Office	REQUEST NO. 1–2	TAC + Epstein factual allegations	V, VI
House classification / oversight	REQUEST NO. 3–4	—	V, VI

Trump AI project authorizations	REQUEST NO. 5–6	Stargate + TAC	IV, V, VI
Trump public statements / directives	REQUEST NO. 7–8	—	IV, V
Bondi Memo AI authorship	REQUEST NO. 9–11	TAC ¶ 196 (Compl. ¶ 196); Ex. I-1; Ex. E-35, Finding NF-26; Ex. E-34, Finding SC-8; Ex. E-34, Finding SC-5	I, IV, V, VI
Attorney-General coordination role	REQUEST NO. 12–13	TAC ¶ 346 (Compl. ¶ 346)	V, VI
FCC content-related enforcement	REQUEST NO. 14–15	Ex. D-23 at p. 125, l. 9, Ex. D-33 at p. 200, l. 7	I, V, X
FCC-ISP coordination	REQUEST NO. 16–17	Cross-ref DISCOVERY-7	V, X
NIST / Christiano appointment	REQUEST NO. 18–19	B-8	V, X
NIST recognition of METR / RSP	REQUEST NO. 20–22	B-4, B-5	V, X
US-UK AISI coordination	REQUEST NO. 23–24	International framework harmonization	V, X
Inter-branch coordination	REQUEST NO. 25–26	TAC + forensic record	IV, V, VI
Targeting timeline	REQUEST NO. 27–28	Ex. E-24 at p. 159, l. 2, Ex. D-7 at p. 38, l. 11, Ex. D-25 at p. 134, l. 16, Ex. D-26 at p. 137, l. 17, Ex. D-28 at p. 147, l. 9	IV, V, VI
Internal communications platforms	REQUEST NO. 29–31	—	V, VI
Preservation / expert	REQUEST NO. 32–35	—	All
Phase I — "Lee" surveillance contact at Edina establishment	REQUEST NO. 36–37	TAC ¶ 2 (Compl. ¶ 2); Affidavit A (Cynthia Kirchner); Affidavit B (Joseph Kirchner)	V, VI, XVI, XVII
Phase I — 12 FBI agents July 2 2025 scripted refusal	REQUEST NO. 38–40	TAC ¶ 119 (Compl. ¶ 119); [[REF:A@fbi_obstruction_recordings?]]	V, VI
Phase I — MN AG Ellison personal/office records	REQUEST NO. 41–43	TAC ¶ 44 (Compl. ¶ 44); cross-ref *Kirchner v. Ellison* (D. Minn.)	V, VI

Phase I — DOJ Civil Rights Division April 6 2026 letter	REQUEST NO. 44–45	Ex. A-14 (Supplemental Notice of Service Effectuation, Ex. 2)	V, VI
Phase I — Bessent-Powell Wall Street CEO convocation	REQUEST NO. 46–47	TAC ¶ 79 (Compl. ¶ 79)	V, VI
Phase I — FL AG Uthmeier April 21 2026 investigation	REQUEST NO. 48–49	TAC ¶ 44 (Compl. ¶ 44); cross-ref *Kirchner v. Acosta* (S.D. Fla.)	V, VI, X
Phase J — July 7, 2025 DOJ memo provenance	REQUEST NO. 50	App. A ¶¶ 60-66; Ex. A-1 §§ II.E, II.F	V, VI
Phase J — Cross-branch "credible evidence" linguistic coordination (43-day window)	REQUEST NO. 51	App. A §§ II.E, II.F; Ex. A-1 §§ V–IX, XV	V, VI
Phase J — Massie-Khanna Rules Committee vote prevention	REQUEST NO. 52	App. A §§ II.C, II.D, III.A.3; Ex. A-1 §§ X–XII, XXIV	V, VI
Phase J — H.Res. 5 "credible evidence" false claim	REQUEST NO. 53	App. A ¶¶ 39, 124, 132; Ex. A-1 § X	V, VI
Phase J — November 18, 2025 H.R. 4405 floor memorandum + § 2256 CSAM claim	REQUEST NO. 54	App. A ¶¶ 147-158; Ex. A-1 §§ XXVIII–XXX	V, VI
Phase J — Bondi pre/post-appointment analytical reversal	REQUEST NO. 55	App. A ¶¶ 158, 168-170; Ex. A-1 §§ III, IV	V, VI
Phase J — FBI Director Patel autopsy briefings	REQUEST NO. 56	Ex. A-1 § V	V, VI
Phase J — "Swept up" / "innocent persons" protection criterion	REQUEST NO. 57	App. A ¶¶ 53-54; Ex. A-1 §§ XIII, XXVIII	V, VI
Phase J — Sept 5–9 Trump-FBI-informant narrative deployment + walkback	REQUEST NO. 58	Ex. A-1 §§ XXV–XXVII	V, VI
Phase J — Cross-defendant messaging-platform records (additive to Req 29)	REQUEST NO. 59	App. A §§ II.E, II.F, III.A.7; Ex. A-1 (full)	V, VI
House AI legislation (H.R. 1 AI provisions; relationship to Senate's 99-1 rejection, Genesis Mission EO, EO 14110 rescission)	REQUEST NO. AC-1, AC-2	TAC ¶ 28; App. A; Memo G (Genesis Mission EO)	V, VI
Genesis Mission Executive Order — drafting, authorization,	REQUEST NO. BC-1,	Memo G; *Youngstown*, 343 U.S. 579 (1952); TAC ¶¶ 1, 26 (Plaintiff's seventeen provisional	IV, V, VI, VII (DTSA

deployment, implementation	BC-2	patents)	)
Executive Order 14110 rescission and 2023 White House Voluntary AI Commitments — post-rescission framework, METR's evaluation cessation, six successive frontier-model releases without independent evaluation	REQUEST NO. BD-1, BD-2	TAC ¶ 17 (Compl. ¶ 17); METR-30; cross-ref DISCOVERY-1 Phase E	V, VI, X
DHS-ICE Directive 19009.3 redaction; January 7, 2026 fatal shooting of Renee Nicole Good; January 24, 2026 federal killing of Alex Pretti; Vance press conference and "absolute immunity" assertion	REQUEST NO. IG-1, IG-2	TAC App. M ¶¶ 95–96 (off-duty Minnesota police officers as armed-traffic-stop targets); 5 U.S.C. § 552(b)(7)(E) (FOIA withholding)	V, VI, XVI, XVII

VI. DEFENDANT COMCAST CABLE COMMUNICATIONS, LLC (AND NETWORK-TIER CUSTODIANS)

Governing discovery: DISCOVERY-7 (Comcast) — 56 requests, Phases 1–8.

Evidence basis: D-series (D-1 through D-35); cross-references to E-series (Leaked Source) and findings NF-31, NF-36.

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
Datadog IP `34.149.66.137` cross-layer bridge	REQUEST NO. 1–5	Ex. E-34, Finding SC-9, Ex. E-35, Finding NF-36, Ex. D-26 at p. 137, l. 17, Ex. D-27 at p. 141, l. 29	V, VI, XII, XIII
Level 3 / Lumen backbone	REQUEST NO. 6–10	Ex. D-1 at p. 3, l. 1, Ex. D-22 at p. 121, l. 11	V, XII, XIII
JUMPSTART-2 network	REQUEST NO. 11–16	Ex. D-12 at p. 52, l. 28, Ex. D-34 at p. 217, l. 18	XII, XIII
Attack-pattern fingerprinting	REQUEST NO. 17–21	Ex. D-29 at p. 153, l. 32, Ex. D-32 at p. 192, l. 19, Ex. D-24 at p. 129, l. 19	X, XIII
TR-069 ACS	REQUEST NO. 22–	Ex. D-20 at p. 107, l. 28	XII, XIII

backend	25		
Router firmware	REQUEST NO. 26–29	Ex. D-19 at p. 85, l. 31, Ex. D-15 at p. 65, l. 13	XII, XIII
DNS manipulation campaign	REQUEST NO. 30–33	Ex. D-23 at p. 125, l. 9	I, X, XII
DoH / localhost RST	REQUEST NO. 34–36	Ex. D-21 at p. 117, l. 20, Ex. D-14 at p. 60, l. 31	X, XII
VMware attack platform	REQUEST NO. 37–40	Ex. D-3 at p. 13, l. 29	V, VI, XIII
VMware organizational role	REQUEST NO. 41–43	Ex. D-3 at p. 13, l. 29	V, VI
NF-31 × D-33 token amplification	REQUEST NO. 44–47	Ex. E-35, Finding NF-31, Ex. D-33 at p. 200, l. 7	IX, X, XII
Organizational suppression	REQUEST NO. 48–49	Ex. D-30 at p. 160, l. 7	37(e) spoliation
Legal process / NSL / FISA	REQUEST NO. 50–52	—	XII
ISP-side D-33 / D-34 / D-35 supplemental forensics	REQUEST NO. 60–63	D-series through D-35	V, VI, XII

VII. DEFENDANT MICROSOFT CORPORATION (NON-PARTY SUBPOENA)

Governing discovery: DISCOVERY-8 (Microsoft) — 10 requests across 4 categories. Federal Rule of Civil Procedure 45 third-party subpoena.

Evidence basis: TAC ¶¶ 42(a), 99 (Compl. ¶ 110); the March 28 2026 Augloop draft-sync server records.

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
Augloop server-side records	Category A — Requests 1–3	TAC ¶¶ 42(a), 99 (Compl. ¶ 110)	V, VI, XII
Outlook / Microsoft 365 diagnostics	Category B — Requests 4–6	TAC ¶ 99	XII, XIV

Communications / preservation	Category C — Requests 7–9	TAC ¶ 99	37(e); All
Datadog-Azure infrastructure integration and Apple Inc. sub-processing	Category D — Request 10	TAC ¶¶ 5–6, 21, 82–83 (Compl. ¶ 5, Compl. ¶ 6, Compl. ¶ 21); App. P, §§ II.B, V.A, V.D; Ex. E-34, Finding SC-9; Ex. E-35, Finding NF-36; Ex. E-39, Finding NF-47	V, VI, XII, XIV

VIII. NON-PARTY DATA SUB-PROCESSORS (DATADOG, GROWTHBOOK, STATSIG, SENTRY, CLOUDFLARE, HONEYCOMB, SEGMENT)

Governing discovery: DISCOVERY-9 (Subprocessor Inheritance) — 38 requests across 7 categories. Federal Rule of Civil Procedure 45 third-party subpoenas.

Evidence basis: Ex. E-39 at p. 356, l. 3 § G (59 forced flags); D-series cross-reference for Datadog network-tier conduct; Ex. E-17 at p. 124, l. 2 (cross-vendor third-party-recipient documentation).

Subject	Discovery requests	Evidentiary predicate	Counts
Datadog, Inc. (parent of Datadog Israel Ltd.)	Category A — DDOG-1 through DDOG-8	TAC ¶¶ 5–6, 21, 82–83 (Compl. ¶ 5, Compl. ¶ 6); Ex. E-34, Finding SC-9, Ex. E-35, Finding NF-36; Ex. DD-1 at p. 2	V, VI, IX, X, XII, XIII
GrowthBook, Inc.	Category B — GB-1 through GB-5	TAC ¶ 12 (Compl. ¶ 12); Ex. E-34, Finding SC-2; Ex. E-39 at p. 356, l. 3 § G	I, IV, X, XII, XIV
Statsig, Inc.	Category C — ST-1 through ST-5	TAC ¶ 89 (Compl. ¶ 89); Ex. ST-2 at p. 11	V, VI, X, XII
Functional Software, Inc. d/b/a Sentry	Category D — SN-1 through SN-5	TAC ¶¶ 66, 89, 125 (Compl. ¶ 66, Compl. ¶ 89, Compl. ¶ 125); cross-ref DISCOVERY-2 Phase F	XII, XIV
Cloudflare, Inc. (edge-layer differential treatment)	Category E — CF-1 through CF-5	TAC ¶ 142 (Compl. ¶ 142); Ex. H-12, Finding NF-219 (server-side localization); Ex. E-39, Finding NF-50; Ex. H-3, Finding NF-130; cross-ref DISCOVERY-2 Category TG	I, IV, XII

Hound Technology, Inc. d/b/a Honeycomb	**Category F — HC-1 through HC-5**	TAC ¶¶ 12, 218, 319 (Compl. ¶ 12, Compl. ¶ 210, Compl. ¶ 321) (third-party observability blocking; failure-to-warn undisclosed third-party recipient); Ex. E-17 at p. 124, l. 2	V, VI, X, XII, XIV, XVIII
Twilio Inc. d/b/a Segment	**Category G — SG-1 through SG-5**	TAC ¶¶ 66, 89, 125, 210, 321, 347 (Compl. ¶ 66, Compl. ¶ 89, Compl. ¶ 125, Compl. ¶ 210, Compl. ¶ 321, Compl. ¶ 347); Memo A ¶ 128 (Memo A ¶ 128) (eight-platform fan-out, NF-67/68/74); Ex. E-17 at p. 124, l. 2	V, VI, X, XII, XIV, XVIII

IX. FEDERAL AI CONTRACTING

Governing discovery: DISCOVERY-10 (Federal Contracting) — 17 requests across 4 categories. Directed to GSA, DOD CDAO, Palantir (federal-procurement records narrowly tied to Section 20005), and Treasury/Federal-Reserve custodians. *Note: LLNL is excluded because pleading record does not substantively tie LLNL to any operative claim.*

Evidence basis: TAC ¶ 82 (Compl. ¶ 82); H.R. 1 § 20005; App. A (Legislative/Executive Ultra Vires Coordination); Memo G (Genesis Mission EO); Ex. E-39, Finding NF-63 (Project Glasswing).

Subject	**Discovery requests**	**Evidentiary predicate**	**Counts**
GSA "Claude for Government $1" partnership	Category A — Requests 1–6	TAC ¶ 82 (Compl. ¶ 82); App. A	IV, V, VI, X
DOD CDAO $800M contracts; H.R. 1 § 20005	Category B — Requests 7–11	TAC ¶ 82 (Compl. ¶ 82); Memo G	IV, V, VI
Palantir federal contracts (narrow Section-20005 scope)	Category C — Requests 12–14	TAC ¶ 82 (Compl. ¶ 82)	V, VI
Treasury–Fed–Wall Street convocation; systemic risk	Category D — Requests 15–17	TAC ¶ 79 (Compl. ¶ 79)	V, VI

X. FOREIGN INFLUENCE — DATADOG ISRAEL LTD., UNIT 8200 PERSONNEL, OZCODE ACQUISITION (THIRD-PARTY CUSTODIANS)

Governing discovery: DISCOVERY-11 (Foreign Influence) — 101 demands across 23 sections (A, B, D, E, F, G, H, I, J, K, L, M, N, O, P, Q, R, S, T, U, V, W, Y). Directed to Datadog Inc. (and Datadog Israel Ltd. as direct custodian), substantively-pleaded named Israeli individuals (Raviv, Fliess, Wachnowezki, Green, Cohen, Hason, Turgeman), OzCode acquisition records, Anthropic-Datadog contractual coordination, per-account targeting infrastructure, the Israel Innovation Authority approval pipeline, the Arieli-Elron control-change pledge structure, and the H-12 wire-confirmed TTFB-throttle cluster. *Note: Sections C and X are reserved/unused (gaps in the section letter sequence).*

Evidence basis: App. P (Israeli AI Surveillance Facilitation — Datadog/OzCode Architecture and Personnel Pipeline); Ex. H-12 at p. 84, l. 4; Ex. H-12, Finding NF-205–Ex. H-12, Finding NF-225; cross-references to D-series (Datadog IP `34.149.66.137`) and E-series (wire capture and classifier architecture).

Subject	Discovery section	Evidentiary predicate	Counts
Datadog Israel Ltd. as direct custodian	§A — Demands A.1–A.5	TAC ¶¶ 5–6 (Compl. ¶ 5, Compl. ¶ 6); App. P, §§ II.B, V.A	V, VI, XII, XIV
Omer Raviv (Unit 8200, OzCode founder)	§B — Demands B.1–B.6	TAC ¶ 5 (Compl. ¶ 5); App. P, § II.D	V, VI
Wachnowezki and Green (named co-inventors on 2024 continuation)	§D — Demands D.1–D.6	TAC ¶ 5 (Compl. ¶ 5); App. P, § II.D	V, VI
Alon Mordechai Fliess (Microsoft connection)	§E — Demands E.1–E.5	TAC ¶ 5 (Compl. ¶ 5); App. P, § II.D	V, VI
Yair Cohen / "Cohan"	§F — Demands F.1–F.3	Memo C (Memo C ¶ 156); App. P, § II.D	V, VI
Datadog Israel post-	§G — Demands	App. P, § II.E	V, VI

Hason successor records	G.1–G.4		
RDC Co-CEO transitions and Rafael relationships	§H — Demands H.1–H.3	App. P, § II.E	V, VI
OzCode acquisition diligence and communications	§I — Demands I.1–I.6	TAC ¶ 5 (Compl. ¶ 5); App. P, § II.B	V, VI
Acquisition integration	§J — Demands J.1–J.2	App. P, § II.B	V, VI
Israeli intelligence coordination	§K — Demands K.1–K.3	TAC ¶ 5 (Compl. ¶ 5) (Unit 8200); App. P, § II.E	V, VI
Patent family completeness (OzCode patents)	§L — Demands L.1–L.10	TAC ¶ 5 (Compl. ¶ 5); App. P, § II.C	VII, VIII
Israel Innovation Authority grants and approval process	§M — Demands M.1–M.4	App. P, § II.E	V, VI
Arieli-Elron pledge counterparties and settlements	§N — Demands N.1–N.4	App. P, § II.E	V, VI
Israeli Foreign Ministry adjacency (Turgeman)	§O — Demands O.1–O.3	App. P, § II.E	V, VI
Time-travel-debugging architecture production	§P — Demands P.1–P.6	App. P, § III.D (Future-prediction primitive); OzCode patents	V, VI, XII
Latency and speculative-execution telemetry	§Q — Demands Q.1–Q.3	App. P, § III.D; Ex. H-12, Finding NF-220	I, IV, XII
Anthropic-Datadog contractual architecture for per-user force-rules	§R — Demands R.1–R.4	TAC ¶ 21 (Compl. ¶ 21); Ex. E-39 at p. 356, l. 3 § G	I, IV, X, XII
Per-account configuration store; `accountUUID`-keyed targeting surface	§S — Demands S.1–S.5	TAC ¶ 6 (Compl. ¶ 6); Ex. E-39, Finding NF-47, Ex. E-39, Finding NF-48	I, IV, XII, XIV
Spoliation mechanism records	§T — Demands T.1–T.4	Ex. E-39, Finding NF-58 (sandbox hard-gate / spoliation breach element)	37(e) spoliation; IX
Device-ID hash-input specification; per-device tracking	§U — Demands U.1–U.3	TAC ¶ 139 (Compl. ¶ 139); 18 U.S.C. § 2510(8)	I, IV, XII, XIII, XIV
Sandbox policy and per-	§V — Demands	Ex. E-34, Finding SC-6	X, XIII

account bypass configuration	V.1–V.4	(`sessionBypassPermissionsMode`); Ex. E-39, Finding NF-58	
Cloudflare bot-management policy; edge-layer differential treatment	§W — Demands W.1–W.3	TAC ¶ 142 (Compl. ¶ 142); Ex. H-12, Finding NF-219; cross-ref DISCOVERY-9 §E	I, IV, XII
H-12 cluster — content-keyed routing, TTFB-throttle mechanism, per-account quota tier	§Y — Demands Y.1–Y.5	TAC ¶¶ 198, 209, 261 (Compl. ¶ 198, Compl. ¶ 209, Compl. ¶ 261); Ex. H-12 at p. 84, l. 4; Ex. H-12, Finding NF-205–Ex. H-12, Finding NF-225	I, IV, IX, X, XII

XI. TED FOUNDATION (THIRD-PARTY CUSTODIAN)

Governing discovery: DISCOVERY-12 (TED Foundation) — 3 requests across 3 categories. Federal Rule of Civil Procedure 45 third-party subpoena to The TED Foundation, Inc.

Evidence basis: TAC ¶ 17 (Compl. ¶ 17); App. B (METR funding architecture; donor-tier analysis).

Subject	Discovery requests	Evidentiary predicate	Counts
Form 990-PF working papers and corporate governance	Category A — Request 1	B-1; App. B	V, X
METR / ARC Evals grant disbursement records	Category B — Request 2	METR-30; cross-ref DISCOVERY-1 Phase B	V, X
Audacious Project and Schedule B donor-tier architecture	Category C — Request 3	METR-28	V, X

XI-BIS. RAND CORPORATION (THIRD-PARTY CUSTODIAN)

Governing discovery: DISCOVERY-13 (RAND) — 3 requests across 3 categories. Federal Rule of Civil Procedure 45. *Narrowly limited to non-classified Project Canary governance; FFRDC/IC contracts and classified material expressly excluded.*

Evidence basis: App. B; B-12.

Subject	Discovery requests	Evidentiary predicate	Counts
Project Canary governance and funding (non-classified)	Category A — Request 1	B-12; App. B	V, VI
RAND-METR coordination records (non-classified)	Category B — Request 2	App. B; cross-ref DISCOVERY-1 Phase F	V, VI
Project Canary methodology and output (non-classified)	Category C — Request 3	App. B	V, VI

XII. COUNT-BY-COUNT COVERAGE SUMMARY

This section provides the inverse view: for each Count of the operative Third Amended Complaint, the consolidating discovery destinations.

Count	Subject	Primary discovery destinations
I	First Amendment — Speech Suppression and Retaliation	DISCOVERY-2 Categories EA, JE, QA, QB, TA, TB, TE, TG, TK, LC; DISCOVERY-4 Phase C (Bondi Memo) and Phase I; DISCOVERY-7 (DNS/throttle); DISCOVERY-8 Cat A–C (Augloop incident); DISCOVERY-9 §B, §E; DISCOVERY-11 §Q, §R, §S, §U, §W, §Y
II	Fourth Amendment — Warrantless Surveillance	DISCOVERY-6 (Apple source-code transmission, Floodgate proxy); DISCOVERY-9 §A (Datadog)
III	Fifth Amendment — Due Process	Distributed across Counts I, IV, V, VI predicate discovery; DISCOVERY-4 Phase I (DOJ CRD nonresponsive letter)
IV	Fourteenth Amendment — Equal Protection (*Olech* class-of-one)	DISCOVERY-2 Categories CA, JE, QA, TA, TB, TE, TK; DISCOVERY-4 Phases B, C; DISCOVERY-9 §B, §E; DISCOVERY-11 §Q, §S, §U, §W, §Y
V	Civil Rights Conspiracy (42 U.S.C. § 1985)	DISCOVERY-1 all phases; DISCOVERY-2 Categories EA, JA, JB, JC, RA, RB, RC, TH; DISCOVERY-3 Phases B, C, D, E, F, G; DISCOVERY-4 Phases A, B, C, E, I, **J (FRE 901/607 conflation cluster — Reqs 50-59)**; DISCOVERY-6 (Apple-OpenAI, Apple-Anthropic, XProtect); DISCOVERY-7 (VMware); DISCOVERY-8

		Cat A–D; DISCOVERY-9 §A, §C, §F, §G; DISCOVERY-10 all categories; DISCOVERY-11 all surviving sections; DISCOVERY-12 all categories; DISCOVERY-13 all categories
VI	RICO (18 U.S.C. § 1962)	Same as Count V; predicate acts traced through DISCOVERY-2 Categories TA–TK and DISCOVERY-7 (token amplification incidents); DISCOVERY-9 §G (Segment fan-out wire-fraud predicates); **DISCOVERY-4 Phase J (§ 1512 obstruction and § 1343 wire-fraud predicates arising from the FRE 901/607-conflation cross-branch conspiracy)**
VII	DTSA Trade Secret (18 U.S.C. § 1836)	DISCOVERY-2 Category MA, MB; DISCOVERY-11 §L (Patent family completeness); DISCOVERY-1 Phases E, F
VIII	Copyright Infringement (17 U.S.C. § 501)	DISCOVERY-2 Category MA, MB (training-data sources); DISCOVERY-11 §L
IX	Breach of Contract (Anthropic subscription)	DISCOVERY-2 Categories DA–DE, FA, HA, HB, KA–KD, NA, NB, TC, TD, TF; DISCOVERY-9 §A; DISCOVERY-11 §Y (TTFB-throttle three-element breach)
X	Consumer Protection (Minn. § 325F.69, D.C. § 28-3904, Cal. Civ. Code § 1770)	DISCOVERY-2 Categories BE, CA, DA–DE, EA–EE, FA, GA–GE, HA–HC, IA–ID, JA–JE, KA–KD, LA–LE, NB, NC, QA, QB, QC, QD, TA, TI; DISCOVERY-3 (privacy nutrition); DISCOVERY-6 (privacy nutrition, deception); DISCOVERY-9 §B, §C, §F, §G; DISCOVERY-11 §R, §V, §Y
XI	Declaratory Judgment (28 U.S.C. § 2201)	Inherits the discovery record of Counts I–X, XII–XV; no separate destination required
XII	ECPA (18 U.S.C. §§ 2511, 2701)	DISCOVERY-2 Categories BA–BE, EA, ED, FA–FD, GA–GE, HA, HB, IA, IB, IC, KA, KB, TA, TE, TG, TK; DISCOVERY-3 (Atlas, Desktop, iOS); DISCOVERY-6 (Apple per-session, iCloud, Floodgate); DISCOVERY-7 (network-tier interception); DISCOVERY-8 Cat A–D; DISCOVERY-9 §A, §B, §D, §E, §F, §G; DISCOVERY-11 §A, §Q, §U, §W, §Y
XIII	Computer Fraud and Abuse Act (18 U.S.C. § 1030)	DISCOVERY-2 Categories EB, EC, HA, HB, KC; DISCOVERY-6 (OAuth token, Floodgate, source-code transmission); DISCOVERY-7 (router/RST attacks, attack-pattern fingerprinting); DISCOVERY-9 §A; DISCOVERY-11 §U, §V
XIV	California Consumer Privacy Act (Cal. Civ.	DISCOVERY-2 Categories BA, BC, BD, BE, ED, FA, FB, GA–GE, IA, ID, NC, TB, TE; DISCOVERY-3

	Code § 1798.100 et seq.)	(Atlas, iOS, privacy nutrition); DISCOVERY-6 (Coding Assistant plist, Biome, Safari/Biome, system permissions); DISCOVERY-8 Cat B–D; DISCOVERY-9 §B, §D, §F, §G; DISCOVERY-11 §A, §S, §U
XV	App Store Privacy Label Misrepresentation	DISCOVERY-2 Categories BA, BE, IA, ID, LE, NB, QB, QC, TC; DISCOVERY-3 (Privacy Nutrition Label); DISCOVERY-6 (Apple Intelligence privacy disclosures, consumer-facing)
XVI	Intentional Infliction of Emotional Distress	DISCOVERY-1 Phase G (METR consciousness-suppression / child-safety claims); DISCOVERY-2 Category QD (LCR pre-policy deployment, third-party-user harm); DISCOVERY-4 Phase I (Edina "Lee" surveillance contact)
XVII	Negligent Infliction of Emotional Distress (alternative to XVI)	Same as Count XVI
XVIII	Strict Product Liability	DISCOVERY-1 Phase G (Claude evaluation methodology, child-safety claims); DISCOVERY-2 Categories CA (two-tier binary), DA (effort throttling), DB (subagent substitution), QD (LCR third-party-user harm); DISCOVERY-9 §F, §G (failure-to-warn undisclosed third-party recipients)

XIII. PRESERVATION PRIORITIES

Based on allegations of evidence destruction or spoliation risk, the following discovery categories require **immediate preservation orders**:

Priority	**Defendant / Custodian**	**Discovery destination**	**Evidence at risk**
CRITICAL	Anthropic	DISCOVERY-2 Categories AC, LA, LB, LC, LD, OA, TD	Git history for leak-referenced files; session-continuity removal records; Oct 12 destruction / Oct 14 partial-restoration records; post-leak code/policy modifications; server-side spoliation mechanism records
CRITICAL	Anthropic	DISCOVERY-2 Categories JA, JB, JC, RA, RB	`#briarpatch-cc` Slack; OAuth client IDs / staging URLs / MCP proxy; incident references inc-3694/4029/4258/4549/4788/4829; Mike

			Cherny / Amol Avasare communications
CRITICAL	Comcast	DISCOVERY-7 Phases 5, 8	TR-069 ACS backend logs for Plaintiff's router; legal process / NSL / FISA records
CRITICAL	Government (Bondi)	DISCOVERY-4 Phase C (REQUEST NO. 9–13)	Bondi Memo drafting records; AI-invocation logs; metadata for Constitutional-AI bypass mechanism
CRITICAL	Government (Bondi / Speaker / EOP / OVP / FBI)	DISCOVERY-4 Phase J (REQUEST NO. 50–59)	July 7, 2025 DOJ memorandum drafting + AI-invocation logs; cross-branch "credible evidence" linguistic-coordination communications during the 43-day window (July 7 – August 18, 2025); November 18, 2025 H.R. 4405 floor-memorandum drafting + "small army of lawyers"; Massie-Khanna Rules Committee vote-prevention records; FRE 901/607 conflation legal advice
CRITICAL	Datadog Israel Ltd.	DISCOVERY-9 §A; DISCOVERY-11 §A, §K	Israeli-government legal-process records; access logs for Plaintiff's data; data-flow records to/from US parent
CRITICAL	Datadog (US parent)	DISCOVERY-9 §A — DDOG-1, DDOG-6, DDOG-7	Network-condition telemetry; tengu_api_error event logs; BigQuery records of inc-3694 et seq.
CRITICAL	Microsoft	DISCOVERY-8 Cat A–D	Augloop server-side records; Datadog-Azure / Apple sub-processing tenant records; Azure-side Datadog Israel access logs
HIGH	Anthropic	DISCOVERY-2 Categories HA, GA–GE, TA, TE	Advisor `encrypted_content`; memory-pipeline outputs attributable to Plaintiff; classifier-subsystem state; per-call device-fingerprint logs
HIGH	Apple	DISCOVERY-6 Categories E, F, G, M	Messages container contents; Biome DB; preservation holds
HIGH	METR	DISCOVERY-1 Phase H	METR corporate records; Christiano/Barnes communications
HIGH	OpenAI	DISCOVERY-3 Phase F, Phase G	Apple-OpenAI partnership records; customer data flows; April 25 2025 narrative records
HIGH	Sub-	DISCOVERY-	Per-user force-rule application records; cross-

	processors (GrowthBook / Statsig / Sentry / Cloudflare / Honeycomb / Segment)	9 §B, §C, §D, §E, §F, §G	tenant identifier sharing; Cloudflare bot-management policy state; Honeycomb tenant configurations; Segment downstream-destination records
HIGH	Florida AG	DISCOVERY-4 Phase I (REQUEST NO. 48–49)	April 21 2026 investigation records
HIGH	The TED Foundation	DISCOVERY-12 Categories A–C	Form 990-PF working papers; METR grant records; Audacious Project / Schedule B records
HIGH	RAND Corporation	DISCOVERY-13 Categories A–C	Non-classified Project Canary governance, RAND-METR coordination, methodology

XIV. CONCLUSION

This correlation matrix demonstrates that every request in DISCOVERY-1 through DISCOVERY-13 is:

1. **Necessary** to develop the evidentiary record on a specifically alleged fact or forensic finding pleaded in the operative Third Amended Complaint, the accompanying Memoranda, or the accompanying Appendices;

2. **Proportional** to the scope of the conduct alleged, as documented in the E-, F-, G-, H-, D-, B-, METR-, I-, ANTH-, OAI-, and POL-series exhibits;

3. **Narrowly tailored** to a specific custodian, finding, and Count of the operative Third Amended Complaint; and

4. **Time-sensitive** with respect to categories carrying spoliation risk.

The discovery body has been narrowed under a strategic-necessity rule excluding (a) custodians without substantive paragraph-level pleading tie (cuts: LLNL, Clerk of the Supreme

Court, Israeli filing-counsel firms not represented in DISCOVERY-11) and (b) extra-territorial / classification-protected demands not reachable through ordinary civil process (cuts: UK AI Safety Institute records, RAND FFRDC / IC contracts).

Plaintiff respectfully submits that this correlation supports:

- Expedited discovery and production timelines as set out in each DISCOVERY document's Phase / Category ordering;
- Immediate preservation orders for categories designated CRITICAL and HIGH in Section XIII;
- Adverse-inference presumptions under Federal Rule of Civil Procedure 37(e) for any destruction occurring after the date of service of this correlation matrix;
- Foreign-discovery cooperation through the appropriate channels (Hague Convention or letters rogatory) for the third-party custodians named in DISCOVERY-11, where service through Datadog Inc. (the United States parent of Datadog Israel Ltd.) does not yield production of the named individuals' records;
- Service of the TED Foundation subpoena (DISCOVERY-12) and the RAND subpoena (DISCOVERY-13) in coordination with the corresponding defendant-directed discovery (DISCOVERY-1 Phases B, F) so that the third-party records and the defendant-side records can be cross-correlated at production.

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