

28 August 2024

To: Justin A. Nelson, Alejandra C. Salinas, Rohit D. Nath, J. Craig Smyser, Jordan W. Connors, Rachel Geman, Wesley Dozier, Anna Freymann, Reilly T. Stoler, Andrea Bartz, Charles Graeber, and Kirk Wallace Johnson

Hello,

I'm writing regarding your inclusion of a reference to me and my creative work with AI in *Bartz et al v. Anthropic PBC*, Case Number 3:24-CV-05417.

Your statements mischaracterize my work in a way that has led to real reputational harm, including causing a major media outlet to incorrectly call me a "fraudster," a false label that has the potential to follow me the rest of my career.

My understanding is that under Federal Rules of Civil Procedure, Rule 11, there is a duty to diligently investigate any factual assertions made in a signed pleading like a complaint.

In this case, it would have been easy to find and contact me, and yet no one did. It's not even clear that anyone did more than read a headline of an article about me and make assumptions on that basis (without even carefully reading the article), rather than independently investigate and verify the facts asserted.

I am respectfully requesting that you amend your complaint or offer some other remedy for the reputational harm that has occurred as a result of your carelessness.

This letter serves as notice that I will send the enclosed document clarifying my position to Judge Alsup via registered mail tomorrow, with a request that it be included publicly in the court's docket in order to clear my good name.

Thanks for your prompt attention,

Tim Boucher

Quebec, Canada

<https://timboucher.ca/about>