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ELECTRONICALLY

FILED

Superior Court of California,
County of San Francisco

08/24/2026

Clerk of the Court

BY: EDWARD SANTOS

Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SAN FRANCISCO

COORDINATION PROCEEDING SPECIAL
TITLE [RULE 3.550]

CHATGPT PRODUCT LIABILITY CASES

This Document Relates to:

*Jean Doe v. OpenAI Foundation (f/k/a OpenAI,
Inc.), Case No. CGC-26-639036*

Judicial Coordination Proceeding No. 5431
Case No. CJC-25-005431

Assigned for All Purposes to:
Hon. Ethan P. Schulman, Dept. 304

**PLAINTIFF JEAN DOE'S NOTICE OF
MOTION AND MOTION TO PROCEED
UNDER A PSEUDONYM**

*[Filed Concurrently: Declaration of Jean Doe;
Declaration of Anne K. Davis; [Proposed] Order]*

Hearing Date: September 23, 2026
Time: 10:00 a.m.
Hon. Ethan P. Schulman
Dept. 304

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on September 23, 2026 at 10:00 a.m., in Department 304 of the
3 Civic Center Courthouse, located at 400 McAllister Street, San Francisco, California 94102, Plaintiff Jean
4 Doe will and hereby does move for an order granting her permission to proceed under a pseudonym given
5 her strong privacy interest and fear of recusal from her community should her identity be made public. She
6 requests that order remain in effect until the conclusion of this action.

7 This Motion is based on the accompanying Memorandum of Points and Authorities, the Declaration
8 of Plaintiff Jean Doe, the Declaration of Anne K. Davis, the papers and records on file, and any further
9 evidence or argument as may be submitted at or before the time of the hearing.

10
11 Dated: August 24, 2026

Respectfully submitted,

12 **STRANCH, JENNINGS & GARVEY, PLLC**

13 By: /s/ Lesley E. Weaver

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1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **INTRODUCTION**

3 This case concerns intensely sensitive and potentially damaging details of Plaintiff Jean Doe’s
4 mental health during a time when Plaintiff was at her most vulnerable. Plaintiff alleges that pursuant to her
5 conversations with ChatGPT, her mental health so deteriorated that—at the instruction of ChatGPT—
6 Plaintiff attempted to take her own life. Compl. ¶¶ 6, 7, 42–51. Plaintiff has sought treatment and support
7 to address the trauma resulting from the suicide attempt and her deeply disturbing conversations with
8 ChatGPT. *Id.* ¶ 54.

9 Plaintiff has an overwhelming interest in maintaining her anonymity given these deeply intimate
10 allegations. If Plaintiff’s identity were to be made public, she would face serious risk or reprisal from her
11 workplace and community. For these reasons, “courts have permitted plaintiffs to proceed under
12 pseudonyms” where, as here, Plaintiff’s allegations mental health information and attempted suicide. *See*
13 *Ocean S. v. Los Angeles Cnty.* (C.D. Cal. Nov. 20, 2023) No. LA CV23-06921 JAK (EX), 2023 WL
14 8191123, at *3 (collecting cases). Plaintiff’s strong privacy interests outweigh any minimal burden
15 associated with allowing her to proceed anonymously—particularly given that the Defendants have already
16 been provided with Plaintiff’s identity.

17 Accordingly, Plaintiff respectfully requests that she be permitted to pursue the lawsuit
18 pseudonymously.

19 **LEGAL STANDARD**

20 A plaintiff may proceed pseudonymously when an “overriding interest will likely be prejudiced
21 without use of a pseudonym, and that it is not feasible to protect the interest with less impact on the
22 [public’s] constitutional right of access [to court records].” *Dep’t of Fair Emp. & Hous. v. Super. Ct. of*
23 *Santa Clara Cnty.* (2022) 82 Cal. App. 5th 105, 111. Courts recognize the following interests as “potentially
24 sufficient to allow for redaction of names []: first, maintaining privacy of highly sensitive and potentially
25 embarrassing personal information []; and second, protecting against the risk of retaliatory harm.” *Roe v.*
26 *Smith* (2025) 116 Cal. App. 5th 227, 239 (citations omitted). “[W]here anonymity is requested to protect
27 against retaliation, the trial court should consider the following factors: (1) the severity of the threatened
28 harm; (2) the reasonableness of the movant's fears; and (3) the movant's particular vulnerability to such

1 retaliation (e.g., child or inmate plaintiffs). *Id.* at 240 (citing *Does I through XXIII v. Advanced Textile*
2 *Corp.* (9th Cir. 2000) 214 F.3d 1058, 1068).

3 “[I]n evaluating whether a party has adequately shown an overriding interest that overcomes the
4 right of public access guaranteed by the First Amendment, courts may consider both state and federal
5 authorities, depending on the facts presented.” *Id.* at 239.

6 ARGUMENT

7 Plaintiff has an overriding interest sufficient to require litigating under an alias given (1) the highly
8 sensitive and private nature of her allegations, (2) Plaintiff’s real fear of social stigmatization and reprisal
9 should information about Plaintiff’s identity be made public, and (3) there would be no resulting prejudice
10 to the public or the parties.

11 *First*, Plaintiff’s allegations concern highly personal and sensitive information about Plaintiff’s
12 health and her attempt to take her own life. Plaintiff has maintained these details as private and not shared
13 them, except as needed for treatment and support. Declaration of Jean Doe (“Doe Decl.”), ¶ 4. Plaintiff has
14 a real and “obvious” privacy interest in maintaining the anonymity of her mental health information. *See*
15 *Oiye v. Fox* (2012) 211 Cal. App. 4th 1036, 1070 (recognizing “medical records as presumptively private”).
16 For these reasons, courts regularly allow plaintiffs to proceed anonymously in cases such as this one, which
17 put at issue plaintiff’s mental health and suicide attempts. *See, e.g., Ocean S.*, 2023 WL 8191123, at *3
18 (allowing plaintiffs to proceed anonymously where their “claims necessarily reveal their medical, mental
19 and behavioral health diagnoses, and for several of Plaintiffs, discussion of their contemplated or attempted
20 suicides”); *K.H.B. by & through K.D.B. v. UnitedHealthcare Ins. Co.* (N.D. Cal. Aug. 24, 2018) No. C 18-
21 04175 WHA, 2018 WL 4053457, at *1 (granting motion to seal identity where allegations concern suicide
22 attempt, multiple mental illnesses, and substance abuse); *Doe v. United of Omaha Life Ins. Co.* (N.D. Cal.
23 Aug. 21, 2023) No. 23-cv-02307-JST, 2023 WL 5919287, at *1 (concerning combination of mental health
24 conditions).

25 *Second*, Plaintiff should be permitted to proceed anonymously given her real and justified fears of
26 personal and professional repercussion. *See Smith*, 116 Cal. App. 5th at 240. Plaintiff reasonably fears
27 embarrassment and that her privacy will be exposed should her identity be revealed in this litigation. *Id.*
28 These fears of social stigmatization are also sufficient to merit protecting Plaintiff’s identity. *See Roe v.*

1 *United States* (E.D. Cal. Feb. 20, 2020) No. 1:19-cv-00270-DAD-BAM, 2020 WL 869153, at *2 (finding
2 that “individual plaintiffs’ fears that proceeding with their true identities in this action would subject them
3 to social stigmatization are reasonable and weighs in favor” of granting motion to proceed anonymously).

4 Plaintiff’s fears are compounded by the fact that Plaintiff’s conversations with ChatGPT, which are
5 at issue in this litigation, include information about Plaintiff’s workplace, hometown, medical history, and
6 other sensitive details about Plaintiff’s life. Doe Decl. ¶ 2.; *see also* Compl. ¶ 31 (“[Plaintiff] spent
7 significant time with ChatGPT discussing how to navigate her workplace as an autistic person”). The
8 Complaint details how ChatGPT fueled Plaintiff’s paranoia and isolation from her community. Compl.
9 ¶¶ 32–41. Should Plaintiff’s identity be made public, Plaintiff reasonably fears she may face stigma from
10 those in her community and workplace given the sensitive nature of these allegations. Doe Decl. ¶ 5.
11 Plaintiff’s fears are particularly acute given that, as an autistic person, she is a vulnerable member of the
12 community and reasonably fears she may face extreme difficulty interacting socially should her identity be
13 made public. *Id.* ¶ 6. These fears weigh heavily in favor of proceeding anonymously. *See Doe v. Valley*
14 *Ctr.-Pauma Unified Sch. Dist.* (S.D. Cal. Mar. 5, 2026) No. 3:25-cv-03686, 2026 WL 622689, at *2 (“Risk
15 of retraumatization, harassment, or personal embarrassment weighs in favor of anonymity where disclosure
16 would expose a plaintiff to additional psychological harm and little prejudice results from nondisclosure.”).

17 Further, the facts of this case, which involve a high-profile company and its dramatic impact on
18 Plaintiff and others, are likely to garner media attention. That also favors granting Plaintiff’s request. *See*
19 *Smith*, 116 Cal. App. 5th at 245 (“[T]here is a greater chance of harm from identifying the parties when the
20 case is in the public eye.”).

21 *Finally*, permitting Plaintiff to proceed pseudonymously will not prejudice the proceedings.
22 Plaintiff’s identity is “not central to the issues raised by [the] case.” *Doe v. Tea Dating Advice, Inc.* (N.D.
23 Cal. Aug. 6, 2025) No. 25-cv-06559-TSH, 2025 WL 2243645, at *1, *2 (granting request that was based
24 on “the sensitive nature of this action,” where plaintiff sued dating app for failure to protect users’ private
25 information). Defendants have already been provided with Plaintiff’s name and personally identifiable
26 information. Davis Decl. ¶¶ 4–5. and thus, will not be prejudiced if this motion is granted. *See Dep’t of*
27 *Fair Emp. and Hous.*, 82 Cal. App. 5th at 110 (“Since the [plaintiff]’s identity is known to the defendant,
28 proceeding anonymously would not [] intrude on the defendant’s rights.”). Nor will proceeding

1 anonymously impair the public’s ability to assess the merits of the case and the important issues it raises.
2 *See Advanced Textile Corp.*, 214 F.3d at 1072; *Todd M.F. v. Santa Clara Cnty. Cent. Fire Prot. Dist.* (N.D.
3 Cal. Sept. 22, 2025) No. 25-cv-07308-VKD, 2025 WL 2696488, at *2 (“In cases involving severe mental
4 illness, courts have concluded that the plaintiffs’ need for anonymity outweighs any prejudice to the
5 defendants and the public’s interest in knowing the plaintiffs’ identities.”). This case raises questions about
6 the responsibilities of artificial intelligence companies to those whose well-being their products put at risk.
7 This case concerns the obligations of these companies when they encourage isolation and paranoia, and
8 provide steps for taking a user’s life. Evaluating the scope of those obligations does not depend on revealing
9 the identity of the campaign’s victim. Even if Plaintiff’s request is granted, the public will remain fully
10 able to assess the legal arguments and evidentiary record in this litigation.

11 Accordingly, there is no prejudice to the public or the parties that would outweigh the significant
12 harm Plaintiff would face if required to proceed under her true name.

13 **CONCLUSION**

14 For the foregoing reasons, Plaintiff respectfully requests that the Court issue an order allowing her
15 to proceed pseudonymously.

16
17 Dated: August 24, 2026

Respectfully submitted,

18 **STRANCH, JENNINGS & GARVEY, PLLC**

19 By: /s/ Lesley E. Weaver

20 Lesley E. Weaver

21 Anne K. Davis

22 Joshua D. Samra

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