CASE NO. 26-2818

UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT

Alanna Zabel

Plaintiff and Appellant,

vs.

Lauren Sanchez, The Collective Book Studio, LLC, and Simon & Schuster, LLC

Defendants and Appellees.

Appeal From The United States District Court, Central District of California, Case No. 2:25-cv-05558-MEMF-E, Hon. Maame Ewusi-Mensah Frimpong

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APPELLEES' MOTION TO FILE CORRECTED ANSWERING BRIEF

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Defendants-Appellees Lauren Sanchez, Collective Book Studio, LLC, and Simon & Schuster, LLC (collectively "Appellees"), by and through undersigned counsel, hereby move the Court for leave to file a corrected answering brief.

On August 12, 2026, Appellees timely filed their Answering Brief (Docket Entry No. 19). Appellant identified in her Reply Brief, filed August 28, 2026, a quotation error on page 29 of Appellees' Answering Brief. Specifically, a phrase was mistakenly identified as a quote when it was in fact counsel's argument based on the cited authority.

The only correction in the Corrected Answering Brief submitted herewith is to remedy that mistake.[1] The substance is unchanged, but the correction is necessary in order to ensure the sentence is accurate.

Appellees respectfully submit there is good cause to accept this Corrected Answering Brief. It does not prejudice Appellant because it does not alter the argument to which she already responded in full. *See*

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[1] The correction applies to one sentence on Page 29 of the Corrected Answering Brief:

Original: because "a new theory *in support* of an issue" is forfeited if it was not raised below. *Id.* at 1321–22 (emphasis added).
Corrected: because a new theory *in support* of an issue is forfeited if it was not raised below. *Id.*

Reply Brief at 19-25. This correction also will not delay proceedings because it was submitted promptly and before any oral argument has been scheduled.

Appellees contacted Appellant in advance of this filing to seek her position on this Motion. Appellant stated that she "takes no position" on it.

DATED: September 1, 2026 Respectfully submitted,

Oliver Rocos
Sarah P. Guinee
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By: *s/ Oliver Rocos*
Oliver Rocos
Attorneys for Defendants and Appellees Lauren Sanchez, Collective Book Studio, LLC and Simon & Schuster, LLC

CERTIFICATE OF COMPLIANCE PURSUANT TO FED. R. APP. 32(A)(7)(C) AND CIRCUIT RULE 32-1

Pursuant to Fed. R. App. P. 32 (a)(7)(C) and Ninth Circuit Rule 32-1, I certify that the attached brief is proportionally spaced, has a typeface of 14 points and contains 256 words.

DATED: September 1, 2026

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