OPPENHEIM + ZEBRAK, LLP
Matthew J. Oppenheim
Nicholas C. Hailey
Jeffrey M. Gould
Corey Miller
Keith Howell
Audrey L. Adu-Appiah
(admitted *pro hac vice*)
4530 Wisconsin Ave., NW, 5th Floor
Washington, DC 20016
Telephone: (202) 480-2999
matt@oandzlaw.com
nick@oandzlaw.com
jeff@oandzlaw.com
corey@oandzlaw.com
khowell@oandzlaw.com
aadu-appiah@oandzlaw.com

Alexander Kaplan
Jennifer Pariser
Andrew Guerra
Bret Matera
Timothy Chung
Michelle Gomez-Reichman
(admitted *pro hac vice*)
461 5th Avenue, 19th Floor
New York, NY 10017
Telephone: (212) 951-1156
alex@oandzlaw.com
jpariser@oandzlaw.com
andrew@oandzlaw.com
bmatera@oandzlaw.com
tchung@oandzlaw.com
mgomez-reichman@oandzlaw.com

Attorneys for Plaintiffs

COBLENTZ PATCH DUFFY & BASS LLP
Jeffrey G. Knowles (SBN 129754)
One Montgomery Street, Suite 3000
San Francisco, CA 94104
Telephone: (415) 391-4800
ef-jgk@cpdb.com

COWAN, LIEBOWITZ & LATMAN, P.C.
Richard S. Mandel
Jonathan Z. King
Richard Dannay
(admitted *pro hac vice*)
114 West 47th Street
New York, NY 10036-1525
Telephone: (212) 790-9200
rsm@cll.com
jzk@cll.com
rxd@cll.com

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case Number: 5:24-cv-03811-EKL-SVK

DECLARATION OF KEITH HOWELL IN SUPPORT OF PLAINTIFFS' MOTION TO PARTIALLY EXCLUDE THE OPINIONS AND EXPERT TESTIMONY OF DR. ANDREW BRAY

Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

I, Keith Howell, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am an attorney at the law firm of Oppenheim and Zebrak, LLP. I represent Plaintiffs Concord Music Group, Inc.; Capitol CMG, Inc., Universal Music Corp., Songs of Universal, Inc., Universal Music – MGB NA LLC, Polygram Publishing, Inc., Universal Music – Z Tunes LLC (collectively, "Universal"); and ABKCO Music, Inc. (collectively, "Publishers") in this matter.

2. I have knowledge of the facts stated herein based on personal knowledge and my review of the documents and other items referenced herein. If called upon to do so, I am able to testify competently to the matters as stated herein.

3. I submit this declaration in support of Publishers' Motion to Partially Exclude the Opinions and Testimony of Defendant Anthropic PBC's Expert Dr. Andrew Bray (the "Motion").

4. Attached hereto as **Exhibit A** is a true and correct copy of the December 19, 2025 Expert Report of Dr. Andrew Bray.

5. Attached hereto as **Exhibit B** is a true and correct copy of the February 13, 2026 Expert Reply Report of Dr. Andrew Bray.

6. Attached hereto as **Exhibit C** is a true and correct copy of the excerpted transcript to the February 24, 2026 deposition of Dr. Andrew Bray.

7. Attached hereto as **Exhibit D** is a true and correct copy of Murthy, K., P., D., Deshpande, P.M. (2012). Improving Recall of Regular Expressions for Information Extraction, WISE 2012, Lecture Notes in Computer Science, vol 7651. Springer, Berlin, Heidelberg. https://doi.org/10.1007/978-3-642-35063-4_33.

8. Attached hereto as **Exhibit E** is a true and correct excerpt from the December 19, 2025 Expert Report of Joshua Dennis.

9. Reflected in **Figure 1 of Plaintiffs' Motion** are true and correct copies of excerpted Claude records from the 5-million sample ordered by the Court, *see* ECF Nos. 318, 377, 407, bearing REVIEWID numbers DOC00010487, DOC00017682, DOC00019134, DOC00027053, DOC00043269, DOC00046406, DOC00060999, DOC00061055, DOC00069318, DOC00082859, DOC00090603, DOC00092475, DOC00102805, DOC00102984, DOC00103244, DOC00103555,

DOC00108048, DOC00117643, DOC00162078, DOC00172993, DOC00174506, DOC00182849, DOC00184852, DOC00192854, DOC00195342, DOC00198425, DOC00224433, DOC00225965, DOC00241827, DOC00259225, DOC00285334, DOC00304209, DOC00314772, DOC01110001, DOC01449894, DOC01503768, DOC01552787, DOC01812344, DOC01822368, DOC01874046, DOC02207618, DOC02251914, DOC02401762, DOC02489651, DOC03057738, DOC03294228, DOC03310742, DOC03337980, DOC03359992, and DOC03758920.

10. Attached hereto as **Exhibit F** is a true and correct copy of a prompt-output record produced by Anthropic in this litigation with the REVIEW ID of DOC 00019134 and the BATES of ANTH_SAMPLE000002680.

11. Attached hereto as **Exhibit G** is a true and correct copy of a prompt-output record produced by Anthropic in this litigation with the REVIEW ID of DOC 00721500 and the BATES of ANTH_SAMPLE000010314.

12. Attached hereto as **Exhibit H** is a true and correct copy of a prompt-output record produced by Anthropic in this litigation with the REVIEW ID of DOC 02401762 and the BATES of ANTH_SAMPLE000029693.

13. Attached hereto as **Exhibit I** is a true and correct copy of a prompt-output record produced by Anthropic in this litigation with the REVIEW ID of DOC 00176575 and the BATES of ANTH_SAMPLE000069181.

14. Attached hereto as **Exhibit J** is a true and correct copy of a prompt-output record produced by Anthropic in this litigation with the REVIEW ID of DOC 02464164 and the BATES of ANTH_SAMPLE000159553.

15. Attached hereto as **Exhibit K**is a true and correct copy of Table A of the February 13, 2026 Expert Reply Report of Dr. Andrew Bray.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge and belief.

Executed in Washington, DC, this 31st day of March, 2026.

/s/ Keith Howell

Keith Howell

SIGNATURE ATTESTATION PURSUANT TO CIVIL L.R. 5-1(h)

Pursuant to Civil L.R. 5-1(h), I hereby attest that concurrence in the filing of this document was obtained from the signatory of this document. I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 31, 2026

/s/ Timothy Chung

Timothy Chung