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ANTHROPIC PBC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 5:24-cv-03811-EKL-SVK

DECLARATION OF ROBIN BURRELL IN SUPPORT OF ANTHROPIC'S OPPOSITION TO PLAINTIFFS' MOTION TO PARTIALLY EXCLUDE THE OPINIONS OF JULIE DAVIS

Judge: Hon. Eumi K. Lee

I, Robin Burrell, declare as follows:

1. I am an attorney at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I am duly licensed to practice in the District of Columbia, and admitted to appear *pro hac vice* in this matter. I represent Defendant Anthropic PBC in this matter.

2. I submit this declaration in support of Anthropic's Opposition to Publishers' Motion to Partially Exclude the Opinions of Julie Davis (Dkt. 657). I have personal knowledge of the matters stated in this declaration, including based on my review of the documents referenced herein. If called as a witness, I could and would competently testify to them.

3. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts of the Deposition of Julie Davis, taken February 19, 2026.

4. Attached hereto as **Exhibit 2** is a true and correct copy of Plaintiffs' Supplemental Responses and Objections to Defendant's Interrogatory No. 2, dated January 15, 2026.

5. Attached hereto as **Exhibit 3** is a true and correct copy of Ninth Circuit Model Jury Instructions Section 17.37 Copyright—Damages—Statutory Damages (17 U.S.C. § 504(c)), https://www.ce9.uscourts.gov/jury-instructions/print/book/export/html/706, dated December 2023.

6. Attached hereto as **Exhibit 4** is a true and correct copy of Plaintiffs' Updated Second Amended Rule 26(a)(1) Initial Disclosures, dated October 28, 2025

7. Attached hereto as **Exhibit 5** is a true and correct copy of the declaration of Julie Davis, dated March 30, 2026.

I declare that the foregoing is true and correct under penalty of perjury.

Executed on this 27th day of July, 2026, in New York, New York.

/s/ *Robin C. Burrell*
Robin C. Burrell

SIGNATURE ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), 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: July 27, 2026

/s/ *Sonal N. Mehta*
Sonal N. Mehta