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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 PUBLISHERS' MOTION TO EXCLUDE EXPERT TESTIMONY OF DR. RUSS ALTMAN

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 Publisher's Motion to Exclude Expert Testimony of Dr. Russ Altman. 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 Shawn Shan, taken March 3, 2026.

4. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the Deposition of Jeffrey Bilmes, taken March 6, 2026.

5. Attached hereto as **Exhibit 3** is a true and correct copy of excerpts of the Expert Report of Jeffrey Bilmes, Ph.D., dated December 19, 2025.

6. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of the Deposition of Russ Altman, taken February 27, 2026.

7. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts of the Deposition of Dario Amodei, taken January 8, 2026.

8. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts of the 30(b)(1) Deposition of Deep Ganguli, taken November 6, 2025.

9. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts of the Deposition of Pranay Sangani, taken November 11, 2025.

10. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts of the Expert Report of Dr. Ben Zhao, dated December 19, 2025.

11. Attached hereto as **Exhibit 9** is a true and correct copy of the declaration of Dr. Russ B. Altman, executed March 31, 2026.

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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