SONAL N. MEHTA (SBN 222086)
sonal.mehta@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Telephone: (650) 858-6000

TAYLOR GOOCH (SBN 294282)
taylor.gooch@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
50 California Street
San Francisco, CA 94111
Telephone: (628) 235-1000

JARED V. GRUBOW (*Pro Hac Vice)*
jared.grubow@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
250 Greenwich Street
New York, NY 10007
Telephone: (212) 230-8800

LOUIS W. TOMPROS (*Pro Hac Vice*)
louis.tompros@wilmerhale.com
DISHA PATEL (*Pro Hac Vice*)
disha.patel@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000

ARI HOLTZBLATT (SBN 354361)
ari.holtzblatt@wilmerhale.com
ROBIN C. BURRELL (*Pro Hac Vice*)
robin.burrell@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
2100 Pennsylvania Ave., NW
Washington, DC 20037
Telephone: (202) 663-6000

Attorneys for Defendant
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 DR. JEFFREY BILMES

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 Dr. Jeffrey Bilmes (Dkt. 655). 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 Jeffrey Bilmes, taken March 6, 2026.

4. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts of the Deposition of Ben Zhao, taken February 20, 2026.

5. Attached hereto as **Exhibit 3** is a true and correct copy of "Enze Liu et al., Somesite I Used To Crawl: Awareness, Agency and Efficacy in Protecting Content Creators From AI Crawlers" marked as Exhibit 3 at the deposition of Ben Zhao.

6. Attached hereto as **Exhibit 4** is a true and correct copy of excerpts of the Expert Report of Dr. Ben Zhao, dated December 19, 2025.

7. Attached hereto as **Exhibit 5** is a true and correct copy of excerpts of the Rebuttal Expert Report of Dr. Ben Zhao, dated January 23, 2026.

8. Attached hereto as **Exhibit 6** is a true and correct copy of excerpts of the Reply Expert Report of Dr. Ben Zhao, dated February 13, 2026.

9. Attached hereto as **Exhibit 7** is a true and correct copy of excerpts of the Deposition of Shawn Shan, taken March 3, 2026.

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

11. Attached hereto as **Exhibit 9** is a true and correct copy of excerpts of the Rebuttal Expert Report of Dr. Shawn Shan, dated January 23, 2026.

12. Attached hereto as **Exhibit 10** is a true and correct copy of excerpts of the Reply Report of Dr. Shawn Shan, dated February 13, 2026.

13. Attached hereto as **Exhibit 11** is a true and correct copy of excerpts of the 30(b)(6) Deposition of Ben Mann, taken November 20, 2025.

14. Attached hereto as **Exhibit 12** is a true and correct copy of the declaration of Jeffrey Bilmes, Ph.D., executed April 1, 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