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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 TIMOTHY CHUNG IN SUPPORT OF PLAINTIFFS' OPPOSITION TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND REPLY IN SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

I, Timothy Chung, 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. Attached hereto is a list of documents, ranging from **Exhibits 124** through **191**, that comprise the additional Exhibits in support of Plaintiffs' Opposition to Defendant Anthropic's Motion for Summary Judgment and Reply in Support of Plaintiffs' Motion for Partial Summary Judgment and cited in Publishers' Responsive Separate Statement and Reply Separate Statement in support of the same. Also attached hereto are the Exhibits, all of which are true and correct copies of the documents therein.

4. I have highlighted on the list in yellow Exhibits that include information that is asserted by Anthropic, in whole or in part, to include Confidential or Highly Confidential Information and that the parties request be maintained under seal. I have highlighted on the list in blue Exhibits that include information that is asserted by Publishers, in whole or in part, to include Confidential or Highly Confidential Information and that the parties request be maintained under seal.

PUBLISHERS' REPLY EXHIBIT LIST

Exhibit No.	Date	Description
124	11/20/2025	Excerpts of Benjamin Mann 30(b)(6) Deposition Transcript
125	11/20/2025; 11/21/2025	Excerpts of Benjamin Mann 30(b)(1) Deposition Transcript
126	1/8/2026	Excerpts of Dario Amodei 30(b)(1) Deposition Transcript

127	11/12/2025	Excerpts of Daniela Amodei 30(b)(1) Deposition Transcript
128	11/21/2025	Excerpts of Jared Kaplan 30(b)(1) Deposition Transcript
129	1/26/2026	Excerpts of Tom Brown 30(b)(1) Deposition Transcript
130	11/6/2025	Excerpts of Deep Ganguli 30(b)(6) Deposition Transcript
131	11/6/2025	Excerpts of Deep Ganguli 30(b)(1) Deposition Transcript
132	11/7/2025	Excerpts of Vinay Rao 30(b)(6) Deposition Transcript
133	11/7/2025	Excerpts of Vinay Rao 30(b)(1) Deposition Transcript
134	11/5/2025	Excerpts of Tom Turvey 30(b)(1) Deposition Transcript
135	11/10/2025	Excerpts of Pranay Sangani 30(b)(1) Deposition Transcript
136	11/12/2025	Excerpts of Dawn Drain 30(b)(1) Deposition Transcript
137	3/4/2026	Excerpts of Dr. Abhishek Nagaraj Deposition Transcript
138	2/27/2026	Excerpts of Dr. Russ Altman 30(b)(1) Deposition Transcript
139	2/24/2026	Excerpts of Dr. Andrew Bray 30(b)(1) Deposition Transcript
140	10/10/2025	Excerpts of Donald (Duff) Berschback 30(b)(6) and 30(b)(1) Deposition Transcript
141	10/29/2025	Excerpts of Alisa Coleman 30(b)(6) Deposition Transcript
142	11/5/2025	Excerpts of Kenton Draughon 30(b)(6) Deposition Transcript
143	11/11/2025	Excerpts of David Kokakis 30(b)(6) Deposition Transcript
144	10/7/2025	Excerpts of Will Pittenger 30(b)(6) Deposition Transcript
145	3/3/2026	Excerpts of Dr. Shawn Shan Deposition Transcript
146	2/20/2026	Excerpts of Dr. Ben Zhao Deposition Transcript
147	2/13/2026	Reply Expert Report of Dr. Ben Zhao
148	2/27/2024	Dep. Ex. 35, internal memo (Anthropic_0000229152)
149	12/4/2023	Dep. Ex. 88, internal memo (Anthropic_0000227016)
150	2/15/2024	Dep. Ex. 90, Slack conversation (Anthropic_0000352753)

151	11/22/2023	Dep. Ex. 130, E-mail notification from Gyula Lakatos (Anthropic_0000342806)
152	-	Dep. Ex. 137, Danny Hernandez et al., *Studying Data Repetition Through Scaling Laws and Mechanistic Interpretability* (Anthropic_0000520123)
153	8/15/2023	Dep. Ex. 140, internal memo (Anthropic_0000507750)
154	August 2023	Dep. Ex. 188, PowerPoint presentation (Anthropic_0000012356)
155	6/4/2021-6/6/2021	Dep. Ex. 205, Slack conversation (Anthropic_0000014096)
156	1/8/2023	Dep. Ex. 235, E-mail notification from Dario Amodei (Anthropic_0000215992)
157	7/15/2023	Dep. Ex. 237, internal memo (Anthropic_0000479241)
158	2/9/2024	Dep. Ex. 240, Slack conversation (Anthropic_0000240665)
159	8/20/2022	Dep. Ex. 251, internal memo (Anthropic_0000478585)
160	9/21/2022	Dep. Ex. 279, internal memo (Anthropic_0000217026)
161	9/18/2025	Publishers' Suppl. Resp. to Defendant Anthropic's Interrog. No. 25
162	9/26/2025	Anthropic employee Claude prompt and output (Anthropic_0000570572)
163	10/12/2025	Anthropic employee Claude prompt and output (Anthropic_0000524116)
164	3/16/2021	Internal memo (Anthropic_0000444301)
165	3/16/2021	Internal memo (Anthropic_0000444332)
166	9/7/2021	Slack conversation (Anthropic_0000352732)
167	-	Compilation of Additional Licenses for Lyrics Display[1]
168	-	Compilation of Additional Licenses for Lyrics Display on Digital Streaming Platforms[2]
169	-	Compilation of sheet music songbooks[3]
170	2/13/2026	Exhibit 4 to the Expert Reply Report of Mr. Joshua Dennis

[1] Bearing Bates numbers: UMPG_0000000311; UMPG_0000023040; UMPG_0000023125; ABKCO_0000000328; ABKCO_0000000025; ABKCO_0000001313; ABKCO_0000000304; ABKCO_0000000369; ABKCO_0000000398; CCMG_0000000662; CCMG_0000000259.

[2] Bearing Bates numbers: CONCORD_0000000260; CONCORD_0000000146; CONCORD_0000000177; ABKCO_0000000379; ABKCO_0000000259.

[3] Bearing Bates numbers: ANTH_DATABASE_0000005467; ANTH_DATABASE_0000005062; ANTH_DATABASE_0000005478.

171	12/18/2024	Ganguli 30(b)(6) Dep. Ex. 5, Alex Tamkin et al., *Clio: Privacy-Preserving Insights into Real-World AI Use* (Anthropic_0000012987)
172	7/22/2020	Dep. Ex. 202, Tom Brown et al., *Language Models are Few-Shot Learners*
173	3/4/2024	Anthropic webpage, *Introducing the next generation of Claude* (Anthropic_0000592435)
174	6/20/2024	Anthropic webpage, *Claude 3.5 Sonnet* (Anthropic_0000592449)
175	March 2024	Anthropic, *The Claude 3 Model Family: Opus, Sonnet, Haiku* (model card)
176	1/23/2020	Jared Kaplan et al., *Scaling Laws for Neural Language Models*
177	2019	Alec Radford, Dario Amodei, *et al*., *Language Models are Unsupervised Multitask Learners*
178	2/24/2026	Billy Perrigo, *Exclusive: Anthropic Drops Flagship Safety Pledge*, TIME
179	2/24/2026	Anthropic webpage, *Anthropic's Responsible Scaling Policy, Version 3.0*
180	3/5/2026	Annual Report 2025, Universal Music Group
181	-	Deposit copy of "Roar" performed by Katy Perry (Plaintiffs_0000009756)
182	-	LyricFind webpage: Lyrics for "Roar" performed by Katy Perry (Plaintiffs_0000003837)
183	-	Deposit copy of "All Along the Watch Tower," performed by Bob Dylan (Plaintiffs_0000009744)
184	-	LyricFind webpage: Lyrics for "All Along the Watchtower," performed by Bob Dylan (Plaintiffs_0000003879)
185	-	Deposit copy of "Uptown Funk," performed by Bruno Mars (Plaintiffs_0000009757)
186	-	LyricFind webpage: Lyrics for "Uptown Funk" performed by Bruno Mars (Plaintiffs_0000003738)
187	-	Deposit copy of "Sweet Home Alabama" performed by Lynyrd Skynyrd (Plaintiffs_0000009758)
188	1/22/2025	Dep. Ex. 136, Anthropic_0000013558
189	March 2025	Dep. Ex. 315, S. Jia, A. Nagaraj, *Cloze Encounters: The Impact of Pirated Data Access on LLM Performance*
190	12/31/2020	Leo Gao et al., *The Pile: An 800GB Dataset of Diverse Text for Language Modeling*

191	5/28/2026	Anthropic webpage, *Anthropic raises $65B in Series H funding at $965B post-money valuation*

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

Executed in New York, NY, this 17th day of August, 2026.

/s/ Timothy Chung

Timothy Chung