Exhibit 29

SONAL N. MEHTA (SBN 222086)
sonal.mehta@wilmerhale.com
ALLISON BINGXUE QUE (SBN 324044)
allison.que@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Telephone: (650) 858-6000

JOSEPH R. WETZEL (SBN 238008)
joe.wetzel@lw.com
LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: (415) 391-0600

Attorneys for Defendant
ANTHROPIC PBC
(Additional Counsel on Next Page)

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

DEFENDANT ANTHROPIC PBC'S SUPPLEMENTAL RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF INTERROGATORIES (NO. 4)
Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY PORTIONS HIGHLIGHTED IN GREY

LOUIS W. TOMPROS (*Pro Hac Vice*)
louis.tompros@wilmerhale.com
STEPHANIE LIN (*Pro Hac Vice*)
stephanie.lin@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 20006
Telephone: (202) 663-6000

TAYLOR GOOCH (SBN 294282)
taylor.gooch@wilmerhale.com
KYLE EDWARDS HAUGH (SBN 323952)
kyle.haugh@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
50 California St.
San Francisco, CA 94111
Telephone: (628) 235-1000

ANDREW M. GASS (SBN 259694)
andrew.gass@lw.com
BRITTANY N. LOVEJOY (SBN 286813)
brittany.lovejoy@lw.com
IVANA DUKANOVIC (SBN 312937)
ivana.dukanovic@lw.com
LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: (415) 391-0600

SARANG V. DAMLE (*Pro Hac Vice*)
sy.damle@lw.com
LATHAM & WATKINS LLP
555 Eleventh Street NW, Suite 1000
Washington, DC 20004
Telephone: (202) 637-2200

ALLISON L. STILLMAN (*Pro Hac Vice*)
alli.stillman@lw.com
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, New York 10020
Telephone: (212) 906-1747

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure 33 and the Local Rules of this Court, Defendant Anthropic PBC ("Anthropic") hereby supplements its response to Plaintiffs' Interrogatory No. 4. This supplemental response is made subject to and without waiving the responses and objections in Anthropic's prior responses. Anthropic has not completed its own investigation and discovery. Accordingly, the following response is based upon Anthropic's knowledge, information, and belief as of the date hereof. Anthropic reserves the right to make any further response if it appears that any omission or error has been made in connection with this response or that future or more accurate information is available. This response is made without prejudice to Anthropic's right to present in any proceeding in this litigation such additional evidence as may be hereafter discovered or evaluated.

PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

1. These responses are made solely for the purpose of this action. Each response is subject to all objections as to relevance, materiality, propriety, and admissibility, and any and all other objections and grounds that would require the exclusion of the responses if such responses were to be introduced at any hearing or trial of this matter, all of which objections and grounds are reserved and may be interposed at the time of such hearing or trial.

2. These responses are made solely on Anthropic's behalf, and do not include information from other parties that is not already in Anthropic's possession, custody, or control.

3. Anthropic has attempted in good faith to respond to these Interrogatories, and its responses are based on information currently available to it at the time of this response. Anthropic has not completed investigating the facts related to this action, and further discovery, investigation, research, and analysis may supply additional information that could alter the disclosures reflected in these responses. In light of the continuing discovery and investigation, Anthropic reserves the right to further amend and/or supplement its responses, and expressly reserves the right to later use and present at trial any evidence, facts, and/or testimony developed or analyzed at a later date that is responsive to the Requests. Notwithstanding the foregoing, Anthropic assumes no obligation to amend and/or supplement its responses beyond that which is required by law.

4. Anthropic objects to the Interrogatories that purport to impose on Anthropic discovery obligations that exceed those provided for in the Federal Rules of Civil Procedure or in the Local Rules for the United States District Court for the Northern District of California, orders entered in this case, including but not limited to the Court's March 25, 2025 and May 23, 2025 Orders resolving certain discovery disputes (ECF Nos. 318, 377), other applicable law, or agreements between the parties.

5. Anthropic objects to the Requests that seek documents protected from disclosure by the attorney-client privilege, the work-product doctrine, the common interest doctrine, Fed. R. Civ. P. 26(b)(4)(A), and/or any other applicable privilege, immunity, or protection. The identification or production of any such document or information shall not constitute a waiver of any applicable objection or privilege. The disclosure of any information or production or identification of documents or communications that are privileged or otherwise immune from discovery shall be handled in accordance with the Protective Order, ESI Protocol, and Training Data and Source Code Inspection Protocol entered in this Action in the Northern District of California. *See* ECF Nos. 293, 298, 386. Any inadvertent discovery and/or production of privileged documents and/or things shall not, pursuant to the Protective Order and Federal Rule of Evidence 502, constitute a waiver of any privilege. For the purposes of responding to these Requests, Anthropic will interpret each Request, definition, and instruction as excluding information subject to privilege or immunity.

6. Anthropic objects to the Interrogatories that seek third-party confidential and/or proprietary information and/or information that is subject to or precluded by restrictions of confidentiality imposed by, or pursuant to, agreements between Anthropic and third parties. Anthropic will cooperate with Plaintiffs to identify what confidential third party information, if any, is relevant and reasonably necessary for investigation of the claims and defenses herein, subject to notice obligations.

7. Anthropic objects to the Interrogatories that seek information not currently in Anthropic's possession, custody, or control.

8. Anthropic objects to the Interrogatories to the extent they seek trade secrets or confidential or proprietary information of Anthropic. Anthropic will produce confidential documents and information as set forth herein, subject to the terms of the M.D. Tenn. Protective Order and any other relevant agreements.

9. Anthropic objects to the Interrogatories to the extent they seek information that (i) does not currently exist; (ii) is unavailable; (iii) is only available to be compiled with the expenditure of extraordinary efforts; and/or (iv) may be impractical or impossible to create and/or reasonably capture, resulting in a significant, punitive expense to Anthropic.

10. Anthropic objects to the Interrogatories that prematurely seek to require Anthropic to disclose individuals or information inconsistent with the Federal Rules of Civil Procedure, including Federal Rule of Civil Procedure 26(a)(2) regarding expert testimony, as well as the rules and orders of this Court.

11. Anthropic objects to the Interrogatories to the extent to which any terms used therein are vague, ambiguous, or overbroad.

12. Anthropic objects to the Interrogatories to the extent they are cumulative and duplicative of other discovery requests propounded by Plaintiffs.

13. Anthropic objects to the Interrogatories to the extent they call for legal conclusions. Any response by Anthropic shall not be construed as providing a legal conclusion regarding the meaning or application of any terms or phrases used in Plaintiffs' Interrogatories, definitions, or instructions.

14. Anthropic objects to each Interrogatory to the extent it contains multiple subparts or the definition or instruction renders an Interrogatory compound. Such Interrogatories constitute separate interrogatories that count towards the limit on interrogatories that Plaintiffs are permitted to propound. Anthropic objects to each and every Interrogatory that would exceed such limit.

15. Anthropic objects to each Interrogatory to the extent it seeks to require Anthropic to do more than conduct an examination of those files or sources that reasonably may be expected

to yield responsive information, or an inquiry of those persons who may be reasonably expected to possess responsive information.

16. Anthropic objects to the Interrogatories to the extent they purport to place an obligation on Anthropic to obtain or provide information that is publicly available or otherwise as readily available to Plaintiffs as it is to Anthropic.

17. Anthropic's response to part or all of any Interrogatory is not intended to be, and shall not be construed to be, a waiver of any part of any objection to any Interrogatory.

18. Anthropic's willingness to respond to any Interrogatory does not constitute an admission that Anthropic agrees with any characterization, definition, or assumption contained in the Interrogatory or an assumption or an acknowledgement by Anthropic that the Interrogatory is proper, that the information sought is within the proper bounds of discovery, or that demands for similar information will be treated in similar fashion.

OBJECTIONS TO DEFINITIONS

1. Anthropic objects to the Definitions of "Defendant," "Anthropic," "You," or "Your" on the basis that they are overbroad. The inclusion of "any other person or entity . . . previously acting on behalf or at the direction" of Anthropic would unreasonably expand Anthropic's burden of responding to these Interrogatories. Anthropic will interpret "Defendant," "Anthropic," "You," or "Your" to mean Anthropic PBC, as identified in the complaint.

2. Anthropic objects to the definition of "AI" as overbroad and vague because it refers to "artificial intelligence" broadly and is not limited to the general purpose, generative artificial intelligence large language models relevant to the claims and defenses in this case.

3. Anthropic objects to the Definition of "Claude API" as overbroad to the extent it refers to models, technologies, or products other than the Anthropic application programming interface(s) that allows developers to integrate Claude's (as defined by the Court's November 26, 2024 Order) capabilities into their own applications and services. Anthropic further objects to the Definition as nonsensical to the extent it encompasses the "products and customers identified on Anthropic's website. Anthropic_0000013921. These "products and customers" may use an

application programming interface offered by Anthropic, but are not themselves the Claude API. Anthropic further objects to the Definition as overbroad to the extent it uses the term "Claude" to refer to general purpose generative-AI large language models outside the scope of the Court's November 26, 2024 Order, i.e., models that are not relevant to Plaintiffs' claims in this action, including models that were never made commercially available or used to develop commercial Claude, or were not trained on datasets that potentially include Publishers' Works. Anthropic will interpret "Claude API" to mean the default configuration of the application programming interface(s) that it offers to external developers so that they, in turn, may integrate Claude, as defined by the Court's November 26, 2024 Order, into their own applications and services.

4. Anthropic objects to the Definition of "Claude" as overbroad to the extent that it includes "any" Anthropic models, technologies, and products that are "within the scope of relevance," irrespective of any end date. Anthropic will interpret "Claude" as ordered by the Court in the November 26, 2024 Order (ECF No. 273) and consistent with its amended response to Interrogatory No. 14. For clarity, Anthropic will not interpret Claude to include any versions of Anthropic's general purpose generative AI LLMs for which pre-training began after November 26, 2024.

5. Anthropic objects to the Definitions of "identify," "identity," and "identification" on the grounds that they are overbroad to the extent they refer to documents or information beyond the requirements of the Federal Rules of Civil Procedure; documents or information that are not in Anthropic's possession, custody, or control; materials that are not proportionally relevant to the needs of this case; and materials from sources that are not reasonably accessible. Anthropic's response should not be construed as acquiescence to Plaintiffs' Definition of these terms or as a limitation of the scope of Anthropic's defenses or legal positions.

6. Anthropic objects to the Definition of "Training Corpus" as vague and ambiguous to the extent it refers to any or all "data used to train" "a generative AI model." Anthropic will interpret "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024, Order.

7. Anthropic objects to the Definition of "Pirate Site" as vague and ambiguous to the extent that it includes the undefined phrases "pirate website," "shadow library," and "online repository for unauthorized copies of copyrighted works or links to same." Anthropic also objects to this Definition as overbroad to the extent that it includes "any . . . other online repository for unauthorized copies of copyrighted works or links to same," which could include any website that hosts or links to any "unauthorized . . . work[]," even inadvertently. Anthropic also objects to this Definition to the extent it calls for a legal conclusion about the potential copyright protections of any materials that may be located on these websites and to the extent it includes the undefined term "pirate."

8. Anthropic objects to Plaintiffs' failure to define terms that are vague, ambiguous, and/or subject to varying interpretations. Where possible, Anthropic will make a reasonable effort to respond to each Interrogatory to the extent not otherwise objectionable, based upon its understanding and interpretation of the Interrogatory, including by interpreting each undefined term or phrase in accordance with its ordinary meaning. If Plaintiffs subsequently assert any interpretation of any Interrogatory that differs from Anthropic's interpretation, Anthropic reserves the right to supplement or amend its objections and responses.

OBJECTIONS TO INSTRUCTIONS

1. Anthropic objects to Instruction No. 20, and to each Interrogatory, as providing an overbroad timeframe.

2. Anthropic objects to Instruction No. 17, and each Interrogatory, to the extent it purports to impose procedures or requirements for identifying information over which Anthropic claims privilege that are different than or exceed those imposed by the Protective Order, the ESI Protocol, Magistrate Judge Susan van Keulen's Civil and Discovery Referral Matters Standing Order (February 2025), and/or any other agreements between the parties that govern production parameters.

3. Anthropic reserves the right to respond to the Interrogatories pursuant to Federal Rule of Civil Procedure 33(d), where appropriate.

4. Each of the foregoing Objections is incorporated in full to each response below as if restated fully therein.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 4:

State Anthropic's total number of Users and Subscribers, broken down by the product or service provided to such Users and Subscribers and the type of user (individual or enterprise), per month and year.

DECEMBER 20, 2024 AMENDED SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4 (HIGHLY CONFIDENTIAL — ATTORNEYS' EYES ONLY):

Anthropic incorporates its General Objections, Objections to Definitions, and Objections to Instructions as if fully asserted herein. Anthropic objects to this Interrogatory as overbroad, unduly burdensome, and seeking information that is neither relevant to either party's claims or defenses nor proportional to the needs of this case. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court in the November 26, 2024 Order, or future versions of Claude released beyond the product development end date to be negotiated by the Parties. Anthropic further objects to this Interrogatory to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Interrogatory to the extent it requires Anthropic to create or provide information in a manner that Anthropic does not keep in the ordinary course of business.

Subject to the foregoing General and Specific Objections, Anthropic responds as follows: The below chart reflects the available data regarding the number of prompts entered on Claude.ai and via the first-party Claude API, on a monthly basis.

Month	Claude.ai Query Count	1P API Query Count
April 2023	n/a	[redacted]
May 2023	[redacted]	[redacted]

June 2023	[redacted]	[redacted]
July 2023	[redacted]	[redacted]
August 2023	[redacted]	[redacted]
September 2023	[redacted]	[redacted]
October 2023	[redacted]	[redacted]
November 2023	[redacted]	[redacted]
December 2023	[redacted]	[redacted]
January 2024	[redacted]	[redacted]
February 2024	[redacted]	[redacted]
March 2024	[redacted]	[redacted]
April 2024	[redacted]	[redacted]
May 2024	[redacted]	[redacted]
June 2024	[redacted]	[redacted]
July 2024	[redacted]	[redacted]
August 2024	[redacted]	[redacted]
September 2024	[redacted]	[redacted]
October 2024	[redacted]	[redacted]
November 2024	[redacted]	[redacted]

NOVEMBER 5, 2025 AMENDED SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4:

Subject to the foregoing General and Specific Objections, Anthropic incorporates herein its prior responses to Interrogatory No. 4. In addition, Anthropic supplements its response pursuant to Fed. R. Civ. P. 33(d), by producing a document sufficient to show the number of Claude active

users with Free, Pro, Max, Teams, or Enterprise on a monthly basis, from June 2023 to September 2025, at Anthropic_0000570511, and a document sufficient to show the number of active first party API and third party API customers, at Anthropic_0000570510. For Free, Pro, Max, Teams, or Enterprise accounts, active users are users who have generated at least one API event within a given month. For first party or third party API customers, active customers are customers who have generated at least one API event within a given month. Anthropic further states that information responsive to this interrogatory may be found in the deposition testimony or exhibits of the following witnesses: Ben Mann, Daniela Amodei, Dawn Drain, Deep Ganguli, Devin Whittle, Jane Leibrock, Jared Kaplan, Pranay Sangani, Tom Brown, Tom Turvey, and Vinay Rao.

Date: November 5, 2025 /s/ *Taylor Gooch*

JOSEPH R. WETZEL (SBN 238008)
joe.wetzel@lw.com
ANDREW M. GASS (SBN 259694)
andrew.gass@lw.com
BRITTANY N. LOVEJOY (SBN 286813)
brittany.lovejoy@lw.com
IVANA DUKANOVIC (SBN 312937)
ivana.dukanovic@lw.com
LATHAM & WATKINS LLP
505 Montgomery Street, Suite 2000
San Francisco, California 94111
Telephone: (415) 391-0600

SARANG V. DAMLE (*Pro Hac Vice*)
sy.damle@lw.com
LATHAM & WATKINS LLP
555 Eleventh Street NW, Suite 1000
Washington, DC 20004
Telephone: (202) 637-2200

ALLISON L. STILLMAN (*Pro Hac Vice*)
alli.stillman@lw.com
LATHAM & WATKINS LLP
1271 Avenue of the Americas
New York, New York 10020
Telephone: (212) 906-1747

SONAL N. MEHTA (SBN 222086)
sonal.mehta@wilmerhale.com
ALLISON BINGXUE QUE (SBN 324044)
allison.que@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Telephone: (650) 858-6000

LOUIS W. TOMPROS (*Pro Hac Vice*)
louis.tompros@wilmerhale.com
STEPHANIE LIN (*Pro Hac Vice*)
stephanie.lin@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) 526-6220

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 20006
Telephone: (202) 663-6000

TAYLOR GOOCH (SBN 294282)
taylor.gooch@wilmerhale.com
KYLE EDWARDS HAUGH (SBN 323952)
kyle.haugh@wilmerhale.com
WILMER CUTLER PICKERING HALE AND DORR LLP
50 California St.
San Francisco, CA 94111
Telephone: (628) 235-1000

Attorneys for Defendant
ANTHROPIC PBC

CERTIFICATE OF SERVICE

I hereby certify that on November 5, 2025 I did cause Defendant Anthropic PBC's Supplemental Responses and Objections to Plaintiffs' Third Set of Interrogatories, No. 18 to be served on the following listed below and in the manner so indicated.

By Electronic Mail

OPPENHEIM + ZEBRAK, LLP
Matthew J. Oppenheim (*Pro Hac Vice*)
Nicholas C. Hailey (*Pro Hac Vice*)
Audrey Adu-Appiah (*Pro Hac Vice*)
Corey Miller (*Pro Hac Vice*)
Jeffrey M. Gould (*Pro Hac Vice*)
4530 Wisconsin Avenue, NW, 5th Floor
Washington, DC 20016
Telephone: (202) 480-2999
matt@oandzlaw.com
nick@oandzlaw.com
aadu-appiah@oandzlaw.com
corey@oandzlaw.com
jeff@oandzlaw.com

COBLENTZ PATCH DUFFY & BASS LLP
Jeffrey G. Knowles
Christopher J. Weiner
Bina Patel
Thomas A. Harvey
One Montgomery Street, Suite 3000
San Francisco, CA 94104
Telephone: (415) 772-5795
Ef-jgk@cpdb.com
cwiener@coblentzlaw.com
bpatel@coblentzlaw.com
Ef-Tah@cpdb.com

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

COWN, LEIBOWITZ & LATMAN, P.C.
Richard S. Mandel (*Pro Hac Vice*)
Jonathan Z. King (*Pro Hac Vice*)
Richard Dannay (*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

Dated: November 5, 2025

By: */s/ Taylor Gooch*
Taylor Gooch