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 St.
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 St
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 PBC'S MOTION TO EXCLUDE EXPERT TESTIMONY AND OPINIONS OF BEN ZHAO]

Judge: Hon. Eumi K. Lee

I, Robin Burrell, declare as follows:

1. I am an attorney at 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.

2. I submit this declaration in support of Anthropic's Motion to Exclude Expert Testimony and Opinions of Ben Zhao. 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 the Opening Expert Report of Dr. Ben Zhao, dated December 19, 2025.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the Rebuttal Expert Report of Dr. Ben Zhao, dated January 23, 2026.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Reply Expert Report of Dr. Ben Zhao, dated February 13, 2026.

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

7. Attached hereto as **Exhibit 5** is a true and correct copy of a document produced by Anthropic, bearing the beginning bates number Anthropic_0000064503.

8. Attached hereto as **Exhibit 6** is a true and correct copy of Anthropic's Amended and Supplemental Responses and Objections to Plaintiffs' Interrogatory Request Nos. 9, 11, 12, dated November 12, 2025.

9. Attached hereto as **Exhibit 7** is a true and correct copy of an excerpt from the Transcript of the March 26, 2026 Status Conference, Dkt. 368.

10. Attached hereto as **Exhibit 8** is a true and correct copy of excerpts from the Deposition Transcript of Michael Candore, taken on November 3, 2025.

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

Executed on March 31, 2026, in Washington, D.C.

/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: March 31, 2026

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