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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 MOTION TO EXCLUDE TESTIMONY OF MICHAEL SMITH

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 Motion to Exclude the Testimony of Michael Smith. 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. Michael Smith, dated December 19, 2025.

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

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

6. Attached hereto as Exhibit 4 is a true and correct copy of the Second Supplemental Report of Dr. Michael Smith, dated March 9, 2026.

7. Attached hereto as Exhibit 5 is a true and correct copy of the March 5, 2026 UMG FY2025 Earnings Call Transcript, as published at https://finance.yahoo.com/quote/UMGNF/earnings/UMGNF-Q4-2025-earnings_call-395143.html, and marked as Exhibit 8 at the April 9, 2026 deposition of Michael Smith.

8. Attached hereto as Exhibit 6 is a true and correct copy of the March 9, 2026 Universal Music Group TMT Conference Transcript, with comments from Matthew Ellis (Chief Financial Officer) and Michael Nash (Executive VP & Chief Digital Officer), marked as Exhibit 9 at the April 9, 2026 deposition of Michael Smith.

9. Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the deposition transcript of Michael Smith, taken on February 23, 2026.

10. Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the deposition transcript of Michael Smith, taken on April 9, 2026.

11. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the Opening Expert Report of Dr. Abhishek Nagaraj, dated December 19, 2025.

12. Attached hereto as Exhibit 10 is a true and correct copy of the declaration of Dr. Abhishek Nagaraj, executed March 31, 2026.

13. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the Opening Expert Report of Julie Davis, dated December 19, 2025.

14. Attached hereto as Exhibit 12 is a true and correct copy of the declaration of Julie Davis, executed March 30, 2026.

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

Executed on this 14th day of April, 2026, in Washington, DC.

/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: April 14, 2026

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