EXHIBIT 7

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** **Judge Eumi K. Lee** **Magistrate Judge Susan van Keulen**

REPLY EXPERT REPORT OF DR. ROBERT LEONARD

CONTAINS MATERIAL DESIGNATED HIGHLY CONFIDENTIAL
UNDER THE PROTECTIVE ORDER

VI. Dr. Lustig's Methodology Misunderstands or Ignores Lyrics as an Established Genre

16. Dr. Lustig's coding methodology ignores several well-established qualities of lyrics as a genre, and how these genre features contribute to an understanding of authorial style and expression. While sub-genres of musical styles exist within lyrics (e.g., pop, rock and roll, hip-hop), as a broader genre, the various composition categories of lyrics as well as the orthographic and morphosyntactic expectations therein are well understood. As Kreyer and Mukherjee (2007)[1] state:

> "From the point of view of a theory of presentation structures in speech and writing (cf. Esser 2000, 2006), pop song lyrics thus represent a particularly interesting and rich genre because they unite medium-independent choices, graphic medium-dependent choices and phonologically motivated medium-dependent choices." (p. 38)

17. And according to Squires (2018)[2]:

> "Among these broad findings [of lyrics as a genre] are mentions of dialect features, including nonstandard spellings representing phonetic pronunciations (Kreyer & Mukherjee 2007). In terms of morphosyntax, Werner cites the presence of the lyrics of *ain't*, copula deletion, invariant *don't*, and double negation as markers of both Americanness and African Americanness, but more generally of a 'colloquial or informal style'." (p. 28)

18. That is, as a genre, lyrics are qualified by, among other features, their "nonstandard spellings representing phonetic pronunciations", their morphosyntactic choices of words like "ain't" rather than "am/are not", and their "colloquial or informal style"—otherwise linguistically known as *register*. In other words, while Dr. Lustig finds the category "unnecessary" (Lustig Report ¶11), the lyrics' "orthography"—their written representation—is an inherent characteristic, and thus

[1] Kreyer, R. & Mukherjee, J. (2007). The Style of Pop Song Lyrics: A Corpus-linguistic Pilot Study. Anglia, 125(1), 31-58. https://doi.org/10.1515/ANGL.2007.31

[2] Squires, L. (2019). Genre and linguistic expectation shift: Evidence from pop song lyrics. Language in Society, 48(1), 1–30. doi:10.1017/S0047404518001112

was factored into my original analysis. This is clearly demonstrated by the relevant literature, e.g.,:

> "Individual marked elements that are the root of local stylistic effects in pop song lyrics include, for example, deviant spellings," (Kreyer & Mukherjee, 2007, p. 34)
>
> "Non-standard spelling is also often used to indicate deviant pronunciation." (Kreyer & Mukherjee, 2007, p. 35)
>
> "Also, the use of deviant spellings, for example, indicates that **the first encoding of pop song lyrics is written language**: spelling is a medium-dependent feature of writing. On the other hand, the free choice of lexical items and grammatical structures in a songtext is almost always restricted by the musical structure, i. e. the melody, the rhythm etc. – features that are of course bound to the spoken medium. Finally, there are style markers that are largely medium-independent, e.g. the choice of a network of lexical items from specific semantic fields," (Kreyer & Mukherjee, 2007, p. 37 emphasis added)

19. Similarly, as noted by Squires (2018):

> "The generic features of song lyrics have been investigated in several corpus analyses looking across subgenres like rock, hip-hop, R&B, metal, pop, and country. As texts, lyrics tend to be repetitive with small vocabularies […] (Murphey 1992; Kreyer & Mukherjee 2007; Werner 2012; Bértoli-Dutra 2014)." (p. 8)

20. That is, lyrics include repetition, and that repetitiveness means that the total number of unique words used within lyrics tends to be smaller than other genres of similar length that trend toward novel language throughout. This means that the entirety of a song's lyrics can be copied with fewer lines of text if repeated lines are excluded..

This is exactly the indicum of plagiarism I catalog in the category of "missing repetition" in my original analysis.

21. Finally, as is noted by Squires (2018), "Lyrics have an especially high proportion of function words (pronouns, articles, determiners)." (p. 6)

22. Research has demonstrated function words to be a useful indicator of individual style and expression. That is, despite their general occurrence frequency, the patterns and use of specific function words remains a stylistic choice of grammatical structures and meaning (e.g., definiteness, logical relations) that varies across authors and texts. As noted by Perlman (2019)[3]:

> "More precisely stated, the ideologies that subtend plagiarism and infringement are ideologies of authorship. They regiment the allowable relations between an author, her text, and the texts of others. They prescribe a minimum distance that texts must maintain between themselves in similarity space. They establish the value of authorial originality and justify the condemnation of anything that detracts from it." (p. 246)

23. As such, Dr. Lustig's practice of filtering out "words or strings that occur simply as a matter of course" removes that which is understood to be a substantial part of the genre of lyrics.

24. Unaware or otherwise dismissive of these well-established genre qualities, the Lustig Report removes both "orthography" and "missing repetition" from consideration and claims to filter out function words, thus arbitrarily eliminating a substantial portion of what identifies lyrics as a genre. As shown, this runs directly counter to how the genre is understood by the relevant linguistic literature. Further, the Lustig Report's approach of ignoring these genre qualities and then unnecessarily quantifying overlap obscures indicia of copying, contrary to the understanding of lyrics as a genre.

[3] Perlman, M. (2019). Meta-ideologies of Textuality: Authorship, Plagiarism, Copyright. Signs and Society, 7(2), 245–287. doi:10.1086/702545

the categories as distinct. For example, Sousa-Silva (2014a)[4] describes the plagiaristic strategy of "word substitution", which:

> "consists of replacing a word or combination of words with words of similar or identical meaning. Although these replacement words usually retain some sort of semantic relationship with the original text (such as synonymy, hyponymy or hypernymy), they can also be from a different semantic field, especially when they aim to retain the coherence with the extra-textual world." (p. 36)

30. While verbatim copying of language is the most obvious form of textual borrowing, word substitution is often considered a type of "sophisticated substitution" (Sousa-Silva, 2014a). Analyzing such a strategy of copying is unnecessarily obfuscated by collapsing text that was *not* copied with text that has been copied via more sophisticated strategies, and considering both "different" text (which may be indicative of "word substitution" or incidental non-copying similarity) and "missing" text as equivalent ignores standard practice in the analysis of potentially copied language. At best, this unnecessarily obfuscates, or, at worst, entirely removes the analyst's ability to accurately identify potential indicia of copying.

31. A well-known example of plagiarism from Coulthard, Johnson & Wright (2017)[5] demonstrates a single plagiarised passage with various indicia of textual borrowing, **emphasized** below (p. 178):

A	B	C
It is essential for all teachers to understand the history of Britain as a multiracial, multi-cultural nation.	In order for teachers to competently acknowledge the ethnic minority, it is essential to understand the history of Britain as a multi-racial, multicultural nation.	It is very important for us as educators to realize that Britain as a nation has become both multi-racial and multi-cultural.

[4] Sousa-Silva, R. (2014a). Investigating academic plagiarism: A forensic linguistics approach to plagiarism detection. International Journal for Educational Integrity, Vol. 10(1). doi: https://doi.org/10.21913/IJEI.v10i1.932

[5] Coulthard, M., Johnson, A., & Wright, D. (2017). An Introduction to forensic linguistics : language in evidence (2nd ed). Routledge. https://doi.org/10.4324/9781315630311

32. Although the excerpt above demonstrates additional indicia of textual borrowing (such as the reordering of topics and paraphrasing), the word substitutions are fairly obvious. The word "essential" becomes "very important", "(all) teachers" becomes "us as educators", and "understand" becomes "realize". Similar textbook examples—encapsulated in the "Different" category included in my analysis but conflated with "Missing" by Dr. Lustig's analysis—occur between the Lyric Find lyrics and Claude outputs, exemplified below.

Lustig Report, Appendix 2, p. 23

I'm breaking in, shaping up Then checking out on the prison bus This is it, the apocalypse	I'm entering, molding up, then bailing out on the jail bus This is it, the disaster

33. Like in the textbook examples of copying, "breaking in" becomes "entering", "shaping" becomes "molding, "prison" becomes "jail", and "apocalypse" becomes "disaster" all without changing the overall meaning (or grammatical structure) of the utterances in which they occur. These changes occur at varying levels of synonymy (with "breaking and entering" as part of a common legal doublet), hypernomy (with "prison" and "apocalypse" being hyponyms of "jail" and "disaster", respectively), or shared semantic fields (with both "bailing" and "checking" regularly co-occurring with "out", and having a related sense of leaving a situation). Conflating such instances with language which is not copied is, thus, demonstrative of ignoring what the literature agrees is a relatively obvious example of copying. Such indicia are, of course, likewise ignored by Dr. Lustig's methodology of looking to match exact syllables across strings of text.

34. Further, Sousa-Silva, Grant, and Maia (2010, p. 6)[6] note that: "Paraphrasing plays a crucial role in providing evidence of intention: a case where the original phrasing is kept, changing just a few words and omitting the sources, for example, is an obvious strategy of deception." That is, erroneously assuming that existing comparable language surrounded by otherwise (entirely or partially) similar

[6] Sousa-Silva, Grant, and Maia (2010). 'I didn't mean to steal someone else's words!': A Forensic Linguistic Approach to Detecting Intentional Plagiarism. 4th International Plagiarism Conference

56. Regardless, the inclusion of the term "parody" in the prompt has no bearing on the conclusions of my analysis because Claude nevertheless outputs the lyrics of the requested songs to the degree of similarity demonstrated in my Opening Report.

57. If anything, what Claude's output demonstrates, again, is that Claude had access to the "original song", to use Dr. Lustig's phrase, enough so to respond to a request for a 'parody' by outputting materials similar to or matching Plaintiffs' lyrics. Indeed, even using his own problematic coding scheme, Dr. Lustig notes that the prompts which included the word "parody" led Claude to produce responses that were "mostly similar + fundamentally similar". See Lustig Report ¶36.

Dated: February 13, 2026

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