EXHIBIT 10

(FILED UNDER SEAL)

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 REPORT OF DR. SHAWN SHAN

February 13, 2026

Contains Information Designated as Confidential and/or Highly Confidential—Attorneys' Eyes Only

this dataset was created or what the data purports to represent. It is not possible to search the data in this form to determine whether it contains copies of the Works in Suit and, if so, how many copies it contains or whether CMI has been removed.

16. Based on my knowledge and experience, it is highly likely that all other training data mixes for other models of Claude would be similarly not human-readable or usable for the purposes of identifying how many copies of Publishers' lyrics are in those mixes or whether CMI was removed.

17. Dr. Bilmes primarily relies on Anthropic's own testimony regarding its deduplication efforts.[19] He performed no independent verification of these claims and did not test the success of these alleged efforts by examining the final datamix. He also concedes that deduplication of large-scale training data is challenging,[20] particularly where the files are not exact copies.[21] Given the number of copies of the Works in Suit in the base data, it is highly likely that numerous copies remained in the final data. This hypothesis is borne out by the ease with which Claude would regurgitate lyrics, as referenced in Publishers' original complaint, before Anthropic added bespoke guardrails specifically to prevent such regurgitation.

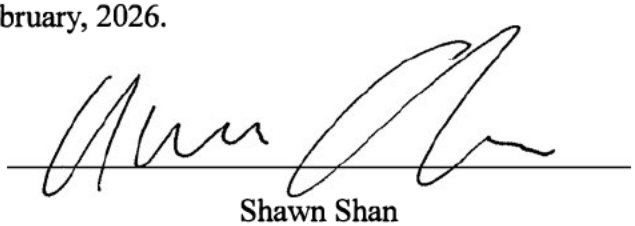
18. As discussed at length in the Expert Report of Dr. Zhao, the volume and concentration of these lyric copies creates a very heightened risk of regurgitation.[22] Dr. Bilmes concedes, citing Dr. Zhao, that repetition of content in training corpus increases risk of memorization.[23]

B. Dr. Bilmes Continues to Confuse the Absence of Robots.txt Instructions for Permission to Scrape and Copy

19. In his Rebuttal, Dr. Bilmes again relies on his manufactured statistic that "[a]cross more than [redacted] URLs scraped by Crabby that contained Plaintiffs' lyrics, Anthropic was

[19] *See, e.g., id.* n.127, n.130; Bilmes Report n.231–37, n.239–43.
[20] Bilmes Rebuttal ¶ 31.
[21] *Id.* n.84 and accompanying text.
[22] Expert Report of Dr. Ben Zhao, PhD (Dec. 19, 2025) (hereinafter "Zhao Report").
[23] Bilmes Rebuttal ¶ 21.

Executed in Chicago, IL on this 13th day of February, 2026.



Shawn Shan