EXHIBIT 3

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

EXPERT REPORT OF DR. BEN ZHAO

December 19, 2025

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

51. Anthropic also sells or licenses first-party API-based access to Claude models to commercial customers, incorporating Claude into these customers' software, products, and systems. Anthropic partners with commercial customers like Quora and DuckDuckGo, to allow users to interact with Claude models through those customers' websites or services.[21] Anthropic also offers API access to its Claude models through third party AI platforms including Amazon Bedrock and Google Vertex.

52. Anthropic first released Claude to certain business customers in late 2022, and it first launched Claude to the general public in March 2023. It has subsequently released a series of newer and more-advanced versions of Claude, both prior to this lawsuit and during the pendency of this litigation.[22] The currently available versions of Claude include Claude Opus 4.5 (released November 24, 2025),[23] Claude Haiku 4.5 (released October 15, 2025),[24] Claude Sonnet 4.5 (released September 29, 2025).[25]

53. The Claude.ai web version is available through multiple tiers of paid subscriptions with different levels of service and a more limited free version.[26] The free version of Claude can be accessed by anyone who creates an account verified with a text message sent to a mobile phone number.

54. The current and earlier versions of Claude are also available to commercial customers to be incorporated into their own software, products, and systems through an API. Claude models are currently already integrated into a variety of products, including group

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[21] *Duck.ai*, DUCKDUCKGO, https://duckduckgo.com/duckduckgo-help-pages/duckai; *How does Duck.ai protect my privacy?*, DUCKDUCKGO, https://duckduckgo.com/duckduckgo-help-pages/duckai/ai-chat-privacy.
[22] Anthropic's Supplemental Response to Plaintiffs' Interrogatory No. 14, dated Oct. 9, 2025, at 4.
[23] *Introducing Claude Opus 4.5*, ANTHROPIC (Nov. 24, 2025), https://www.anthropic.com/news/claude-opus-4-5.
[24] *Introducing Claude Haiku 4.5*, ANTHROPIC (Oct. 15, 2025), https://www.anthropic.com/news/claude-haiku-4-5.
[25] *Introducing Claude Sonnet 4.5*, ANTHROPIC (Sept. 29, 2025), https://www.anthropic.com/news/claude-sonnet-4-5.
[26] *Individual Pricing*, Anthropic, https://claude.com/pricing (last visited Dec. 14, 2025).

Dated: December 19, 2025

Ben Zhao