EXHIBIT 6

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

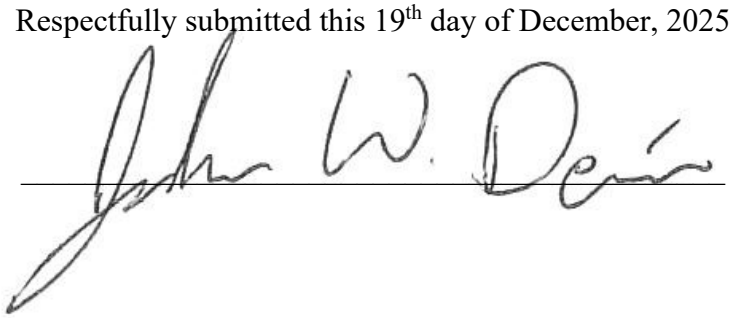
Defendant.

Case No.: 5:24-cv-03811-EKL-SVK

Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

EXPERT REPORT OF JOSHUA W. DENNIS

Respectfully submitted this 19th day of December, 2025



CONTAINS INFORMATION DESIGNATED AS "CONFIDENTIAL" AND "HIGHLY CONFIDENTIAL—ATTORNEYS' EYES ONLY"

UNDER PROTECTIVE ORDER

III. INFORMATION CONSIDERED

11. I considered information from a variety of sources, including (i) information filed by the parties in this proceeding, (ii) information produced by relevant parties, and (iii) information from independent research.

12. The information I considered is listed in **Exhibit 2**, as well as the footnotes and other citations in this report. I reserve the ability to consider further discovery in this case, including additional expert reports, transcripts of depositions, and documents produced or made available.

IV. SUMMARY OF OPINIONS

13. This summary of opinions sets forth the results of my data analyses, including analysis of various large datasets and other documentation, as described in more detail in the sections of this report that follow. My analyses primarily focus on records provided in this case concerning human prompt input and the resulting response output by Anthropic's AI model, Claude, as discussed in detail herein.

14. My summary of opinions is that the data reflects the following:[3]

Analysis of Work-in-Suit Records[4]

15. The number of Work-in-Suit Records[5] associated with each Prompt and Output Category are shown in the table below:[6]

[3] My Summary of Opinions may use certain capitalized terms that are defined in subsequent sections of this report.

[4] See Report Section VII.C.

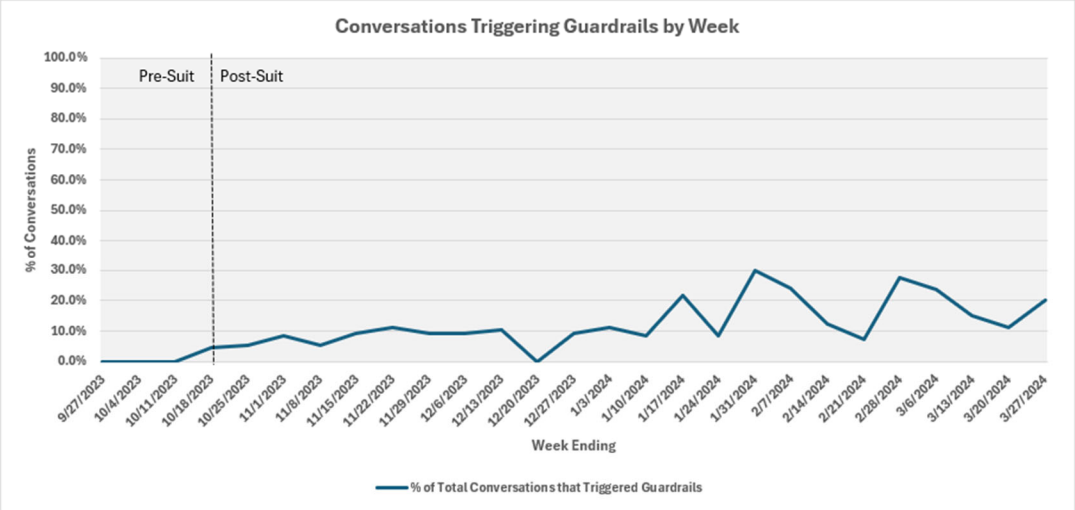
[5] I understand that Anthropic performed searches of Prompts and Outputs from the period of September 22, 2023 to March 22, 2024 based on certain song titles or lyrics excerpts for the Works-in-Suit. Out of the broader set of Records that Anthropic produced in connection with those searches, Counsel provide me with 851 Work-in-Suit Records that were the subject of this analysis. See Report Section VI.A.i.

[6] See Report Section VII.C.xv; and **Exhibit 4A**.

Prompt Category	# of Records	% of Records
1. Request for lyrics based upon provided song title(s) or lyrics	165	19.4%
2. Request for lyrics based upon provided artist(s), but not song title(s)	5	0.6%
3. Request for lyrics based upon provided topic(s)	38	4.5%
4. Request for translation of lyrics based upon provided song title(s) or lyrics	2	0.2%
5. Request for song title(s) based upon provided lyrics	42	4.9%
6. Request for song title(s) based upon provided artist(s)	7	0.8%
7. Request for song title(s) based upon a provided topic(s)	165	19.4%
8. Request for new song lyrics based upon provided artist(s), song title(s) or lyrics	33	3.9%
9. Request for new song lyrics based upon provided topic(s)	4	0.5%
10. Request for artist based upon on provided song title(s), lyrics or topic(s)	2	0.2%
11. Request for meaning or discussion based upon provided song title(s) or lyrics	272	32.0%
12. Request for meaning or discussion based upon provided artist(s)	25	2.9%
13. Request for meaning or discussion based upon provided topic(s)	69	8.1%
14. Request not captured in other categories	22	2.6%
Grand Total	**851**	**100.0%**

Output Category	# of Records	% of Records
1. Output contains lyrics (no copyright Guardrail noted)	731	85.9%
2. Output contains new lyrics (no copyright Guardrail noted)	36	4.2%
3. Output contains lyrics and copyright Guardrail noted	80	9.4%
4. Output contains new lyrics and copyright Guardrail noted	4	0.5%
Grand Total	**851**	**100.0%**

- When charted over time, the Work-in-Suit Records supports the conclusion that (1) prior to the filing of the Complaint in this matter, Guardrails were largely ineffective in preventing lyric-related Output; and (2) following the filing of the Complaint in this matter, Guardrails were gradually implemented to address lyric-related Output, but they still failed to prevent such lyric-related Output in many instances, as shown in the chart below:[7]



[7] See Report Section VII.C.xvi; and **Exhibit 4G**. Excludes 1 Work-in-Suit Record for which no Prompt date was available.

- My analysis reflects that on average Guardrails were triggered in less than 10% of the instances, and were more likely to be triggered in response to Prompts that specifically requested new or existing lyrics based upon provided song artist(s), title(s), or lyrics (Prompt Categories 1, 2, 8), or where the user requested song title(s) based upon provided artist(s) or lyrics (Prompt Categories 5, 6). These Prompt Categories collectively comprised approximately 30% of the Work-in-Suit Records.[8]

- Guardrails were less likely to be triggered in response to Prompts where the user requested new or existing lyrics based upon provided topics (i.e., Categories 3 and 9), or where the user requested meaning or discussion based on provided song artist(s), title(s), lyrics or topics (Prompt Categories 11, 12, 13). Guardrails were also very infrequently triggered where the user requested song title(s) based upon provided topic(s) (Prompt Category 7).[9] These Prompt Categories collectively comprised approximately 67% of the Work-in-Suit Records.[10]

- Across all 851 Work-in-Suit records, I identified at least 60 instances related to potential commercial use, such as generating a search engine optimized (SEO) article that contained new or existing lyrics. Over 80% of these requests were for meaning or discussion, and particularly in connection with provided song title(s) or lyrics, as shown in the table below:[11]

Prompt Category	Output Category	# of Records	% of Records
3. Request for lyrics based upon provided topic(s)	1. Output contains lyrics (no copyright Guardrail noted)	2	3.3%
6. Request for song title(s) based upon provided artist(s)	1. Output contains lyrics (no copyright Guardrail noted)	1	1.7%
7. Request for song title(s) based upon a provided topic(s)	1. Output contains lyrics (no copyright Guardrail noted)	3	5.0%
10. Request for artist based upon on provided song title(s), lyrics or topic(s)	1. Output contains lyrics (no copyright Guardrail noted)	1	1.7%
11. Request for meaning or discussion based upon provided song title(s) or lyrics	1. Output contains lyrics (no copyright Guardrail noted)	33	55.0%
	2. Output contains new lyrics (no copyright Guardrail noted)	1	1.7%
12. Request for meaning or discussion based upon provided artist(s)	1. Output contains lyrics (no copyright Guardrail noted)	6	10.0%
13. Request for meaning or discussion based upon provided topic(s)	1. Output contains lyrics (no copyright Guardrail noted)	11	18.3%
14. Request not captured in other categories	1. Output contains lyrics (no copyright Guardrail noted)	2	3.3%
Grand Total		**60**	**100.0%**

[8] See Report Section VII.C.xvi.

[9] See Report Section VII.C.xvi.

[10] See Report Section VII.C.xvi.

[11] See Report Section VII.C.xvii; and **Exhibit 4H**.