EXHIBIT 13

(FILED UNDER SEAL)

UNITED STATES DISTRICT COURT

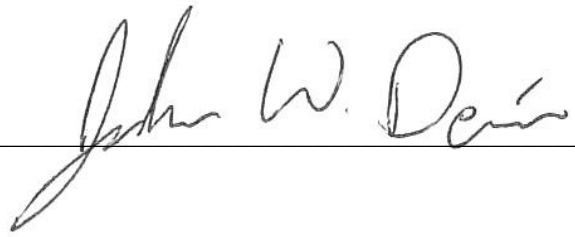
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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 OPPOSITION REPORT OF JOSHUA W. DENNIS

Respectfully submitted this 23rd day of January, 2026



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

UNDER PROTECTIVE ORDER

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List of Opposition Exhibits

Opposition Exhibit Number	Description
1	[INTENTIONALLY LEFT BLANK]
2	Documents Considered (January 23, 2026)
3	Summary of Song/Lyric Requests in the Clio Data (5/1/25 - 7/2/25)
4	Summary of Clusters and Records by Level in the Clio Data (5/1/25 - 7/2/25)
5	Song/Lyric Cluster Detail in the Clio Data (5/1/25 - 7/2/25)
6	Clio Data (5/1/25 - 7/2/25)
7	Clio Data Level 1 Clusters (5/1/2025 - 5/7/2025)
8	Results of Question 3 for Dr. Bray's Guardrail Periods

I. INTRODUCTION

1. I, Joshua W. Dennis, am a Partner in the Boston office of StoneTurn Group LLP ("StoneTurn"). I provide financial and economic consulting services—including the analysis of complex data—to attorneys and companies. I have more than 20 years of experience working with clients and counsel on matters requiring complex data analysis, such as economic damages, forensic accounting, compliance monitoring, and valuation engagements.

2. I previously submitted an Expert Report in this matter dated December 19, 2025 (the "Dennis Report" or "my earlier report"), which more fully describes my education, training, and experience.[1]

3. As discussed in my earlier report, Oppenheim + Zebrak, LLP ("Counsel") retained StoneTurn[2] to analyze a variety of large data sources and other information produced by the parties in this case. I understand that these analyses, or the results thereof, may be considered in connection with claims of alleged copyright infringement by Plaintiffs, Concord Music Group, Inc., et al. ("Publishers"), against Defendant, Anthropic PBC ("Anthropic").[3]

4. Subsequent to the issuance of my earlier report, I received certain reports submitted by other experts in this matter, including experts retained on behalf of Anthropic. Specifically, I received and reviewed the following:

- Opening Expert Report of Dr. Andrew Bray, December 19, 2025 ("Bray Report")
- Expert Report of Jeffrey Bilmes, Ph.D., December 19, 2025 ("Bilmes Report").

5. This Opposition Report addresses and responds to certain topics and opinions raised in the Bray Report and Bilmes Report.[4]

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[1] I may utilize certain capitalized terms in this Opposition Report that are specifically defined in the Dennis Report and incorporated herein by reference.

[2] As used herein, other than references to my education and experience, "I," "We," or "StoneTurn" shall mean either me personally or those StoneTurn professionals acting under my direct supervision. Also, "My," "Our," and "Us" shall refer to actions taken by me personally or by those StoneTurn professionals acting under my direct supervision. All of the conclusions and opinions expressed herein are my own.

[3] First Amended Complaint and Demand for Jury Trial, Case No. 5:24-cv-03811-EKL-SVK, ECF No. 337, April 25, 2025 ("Amended Complaint").

[4] With respect to the Bilmes Report, my review primarily focused on his analysis of data from Anthropic's Clio system cover the nine week period of May 1, 2025 through July 2, 2025. (Anthropic_0000429482-490.)

6. An updated list of information I considered is contained in **Opposition Exhibit 2**, as well as the footnotes and other citations in this report or my earlier 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.

7. While my work on this matter is ongoing, this report summarizes my current opinions given the information available to date. I may consider any additional materials if produced close in time or subsequent to the issuance of this report and modify or supplement my analysis or opinions as necessary. I also reserve the right to address any comments that I may be receive from Anthropic, or an expert retained by Anthropic, related to my work in this matter, as outlined in this report and my earlier report, including the exhibits thereto.

8. In connection with my anticipated trial testimony in this action, I may create, from various documents produced in this litigation, demonstrative exhibits which refer or relate to the matters discussed in this report, or in my deposition testimony (if I were to be deposed).

II. RESPONSE TO THE BRAY REPORT

A. Overview of Dr. Bray's Assignment and Analysis

9. In his report, Dr. Bray states that he was asked to answer five research questions regarding Prompts and Outputs in the 5 million Sample Records ("Questions"). These Questions included the following:[5]

- **Question 1**: What percentage of prompts seek any amount or form of lyric regurgitation?
- **Question 2**: Of the percentage of prompts that seek any amount or form of lyric regurgitation (i.e., prompts that are responsive to Q1), what percentage seek any amount or form of lyric regurgitation to Works-in-Suit?
- **Question 3**: What percentage of outputs provide any amount or form of lyric regurgitation?
- **Question 4**: What percentage of outputs provide any amount or form of lyrics to Works-in-Suit?

[5] Bray Report at 9.

- **Question 5**: How do the results of Questions 1, 2 and 4 change, if at all, over time, given the implementation and expansion of Claude's guardrails?

10. To accomplish this task, Dr. Bray used a method based primarily on regular expressions, which is coding that can search for specified patterns in text. As a supposed check to his regular expressions, and as an attempt to refine them, Dr. Bray also used AI, specifically Claude Haiku 4.5, to classify an approximately 46,000 Record subsample of Prompts or Outputs in a manner that he contends met the criteria for certain of his Questions.[6]

11. As an initial step in his analysis, Dr. Bray excluded from the population of Sample Records certain Records, including:

- 1,693,579 "Non-English" Records, which Dr. Bray defines as where the last Prompt was classified as anything other than 95% in English;[7]
- 302,631 "LogID Duplicates" Records, which Dr. Bray defines as having identical text content and sharing the same LogID;[8]
- 725,459 "Title Records" Records, which Dr. Bray describes as automatically generated, back-end records based on a user's interaction with Claude at some point after a user submits prompt(s) to Claude for purposes of generating a label for the Conversation;[9]
- 65 "Quarantined" Records, which Dr. Bray describes as containing the text "Document has been quarantined for security purposes;"[10]
- 21,171 "Redacted" Records, which Dr. Bray describes as containing redacted content and no Output;[11] and
- 953 "blank" Records, which Dr. Bray describes as either having no text present and/or where text was withheld for privilege.[12]

[6] Bray Report at 9-10. I did not see in the Bray Report any specific discussion regarding why he selected 46,000 as the subsample size, or why he did not attempt to run Claude Haiku across the entirety of his Adjusted Sample.

[7] Bray Report at 18. I assume Dr. Bray means anything other than at least 95% in English.

[8] Bray Report at 18-19.

[9] Bray Report at 20-21.

[10] Bray Report at 22. I note that the words "has been" do not actually appear in the text of his example Quarantined document.

[11] Bray Report at 22.

[12] Bray Report at 23.

12. In total, and after considering Records removed for more than one reason, Dr. Bray excluded 2,646,161 of the total 5 million Sample Records, or 52.9%. Thus, Dr. Bray's analysis was focused on the remaining 2,353,839 Records comprising his "Adjusted Sample," as shown in the table below:[13]

Description	# of Records	% of Sample Records	# of Additional Records Excluded[14]	% of Sample Records
Total Sample Records	***5,000,000***	***100.0%***		
1) Non-English Files[15]	1,693,579	33.9%	1,693,579	33.9%
2) Duplicate LogID[16]	302,631	6.1%	286,011	5.7%
3) Title Records[17]	725,459	14.5%	648,506	13.0%
4) Quarantined Records[18]	65	0.0%	64	0.0%
5) Redacted Records[19]	21,171	0.4%	18,001	0.4%
6) Blank/Privileged Records[20]	953	0.0%	0	0.0%
Total Records Excluded by Dr. Bray			**2,646,161**	52.9%
Total Records in Dr. Bray's Adjusted Sample	**2,353,839**	**47.1%**		

13. Based on his analysis of the remaining Records in his Adjusted Sample, Dr. Bray calculates certain amounts and ratios that are provided in his reported results for each of the five Questions, as summarized below:[21]

[13] Also, see e.g., Bray Report at 24.

[14] Given that a Record could have been excluded by Dr. Bray for more than one reason, the # of Additional Records Excluded represents the incremental number of Records excluded after consideration of the previous reason(s).

[15] excluded_nonenglish_part1.csv; and excluded_nonenglish_part2.csv.

[16] excluded_duplicatelogid.csv.

[17] excluded_titlerecord.csv.

[18] excluded_quarantined.csv.

[19] excluded_redacted.csv.

[20] Dr. Bray did not provide a support file listing the Records he determined to be blank or privileged, however this population already appeared to be excluded for other reasons.

[21] Bray Report at 11-12. Also, see p40q1.csv; p40q2.csv; p40q3.csv; and p40q4.csv.

Question	Description	# of Records	% of Adjusted Sample Records
1	Prompts in the Adjusted Sample that seek any amount or form of lyric regurgitation[22]	1,029	0.0437%
2	Prompts in Question 1 that seek any amount or form of lyric regurgitation to Works-in-Suit	138	0.0059%
2a	Prompts in Question 2a that belong to Publishers' known investigator	115	
3	Outputs in the Adjusted Sample that provide any amount of lyric regurgitation	325	0.0138%
4	Outputs in Question 3 that provide any amount of lyric regurgitation to Works-in-Suit	87	0.0037%
4a	Outputs in Question 4a that belong to Publishers' known investigator	82	
5	Outputs in the Adjusted Sample that provide any amount of lyric regurgitation to Works-in-Suit after [redacted]	0	

B. Limitations to my Opposition Analysis

14. At the time I received the Bray Report (i.e., December 22, 2024), I also requested the associated backup materials for his report. However, material supporting Dr. Bray's results and exclusions was not provided to me in full until January 12, 2025, or just eleven (11) days prior to the issuance of this Opposition Report. Additionally, based on my review of the support provided for the Bray Report at that time, certain supporting materials still appeared to be missing or incomplete.

15. For example, Dr. Bray's analysis focuses exclusively on the last Prompt and Output pair in each Record. To accomplish this, his code makes clear his database contained a "LastPrompt" and "LastOutput" field,[23] despite neither being included in the original metadata for the Sample Records. Thus, while these fields were presumably created by Dr. Bray as part of his analysis, he did not provide the code used to isolate the last Prompt and Output portion of the broader extracted text for a given Record. Rather, I received LastPrompt and LastOutput field values for each Sample Record on January 19, 2026, or just four (4) days prior to the issuance of this Opposition Report.

[22] I noted that Dr. Bray's original regular expression for Question 1 (i.e., prior to his final "Q1v2" version) identified a total of 863 records, which Dr. Bray characterized as falling "within the parameters of Question 1, meaning .0037% (0.000037 or less than 4/1000ths of a percent) of the Adjusted Sample included prompts that sought any amount or form of lyric regurgitation from September 22, 2023-March 22, 2024." (Bray Report at 29; and q1_preClaude.csv.) However, Dr. Bray appears to have added an additional zero (0) to the decimal place of these results: 863 / 2,353,839 = 0.00037, which is 0.037% or 4/100ths of a percent.

[23] See e.g., Bray Report, Table F.

16. Dr. Bray also relied upon analysis performed by a Relativity vendor, Lighthouse, as part of his attempt to identify "non-English" files. Specifically, Dr. Bray states:[24]

> To determine how prevalent this issue was, the Relativity vendor ran a language identification process over the last prompt in each file in the Sample, in order to identify Non-English Files.
>
> From my discussions with the Relativity vendor, I understand that they used a language identification tool which analyzed the extracted text of each document using a naïve Bayesian classifier.
>
> I understand that this tool calculated the percentage of text bytes associated with each detected language in a record, in order to determine a "primary" language, or the language with the highest percentage of text. Information about the dominant language would then be displayed in a "Primary Language" field.

17. While Dr. Bray provided a listing of which Records he excluded as "non-English,"[25] I have not received data for the Sample Records showing the Primary Language or associated percentages on which he relied.

18. Further, Dr. Bray did not provide other supporting materials, such as the csv file he used for purposes of determining if an Output contained lyrics to a Work-in-Suit (i.e., works-in-suit/wis_exhibit_b.csv).

19. Further, on January 7, 2026, I requested the 5 million Sample Records housed by the third-party Relativity vendor, Lighthouse, which were the subject of Dr. Bray's analysis. I understand that on or around January 10, 2026 Anthropic blocked my request for the metadata and extracted text for the Sample Records utilized by Dr. Bray, which caused additional delays and inefficiencies in my opposition analysis as Lighthouse was required to develop an alternative solution in the form of remote desktop access to a SQL server database. I did not receive access to this database until January 16, 2026 and my staff were not granted access until January 20, 2026, just three (3) days prior to the issuance of this Opposition Report.

20. Dr. Bray's analysis is also grounded in certain fundamental understandings for which he provides no citation or source. For example, with respect to the broader approximately [redacted] million Records in the Record Universe, Dr. Bray states:

> My understanding is that when a user sends a prompt to Claude, it will respond with an output and a record will be created containing the text of the prompt/output pair. If the user sends a second prompt as part of the same conversation, Claude will respond and a record will be created that contains all of the text of the first prompt/output pair followed by the second prompt/output pair.

[24] Bray Report at 16-17.

[25] excluded_nonenglish_part1.csv; and excluded_nonenglish_part2.csv.

> This process continues for the length of the conversation, creating a record for each new prompt/output pair.

21. While he references a single example from the Sample Records that he contends reflects behavior consistent with this understanding, Dr. Bray provides no further evidence or basis. I have also not seen any produced documents, deposition testimony or other sources in this case that would allow me to verify Dr. Bray's uncited understanding. I have also not seen any substantive analysis demonstrating if, or to what extent each Prompt and Output pair within a Conversation necessarily appears as the last Prompt and Output pair elsewhere in the Record Universe.

22. To the extent such evidence is produced or made available, I reserve the right to consider and respond to it.

C. Dr. Bray's Exclusion of Records

23. As described above, Dr. Bray excludes over 2.6 million Records from his analysis, which is more than half of the 5 million Record Sample. Of these 2.6 million Records, approximately 1.7 million were considered by Dr. Bray to be "non-English" files. Specifically, Dr. Bray states he excluded any files "for which the **last prompt** was classified as anything other than 95% in English" **(emphasis added)**.[26]

24. However, he neither provides an explanation or basis for this 95% threshold nor a reason to assume, for example, that non-English Prompts (including last Prompts) do not request lyrics and/or that the resulting Outputs do not contain lyrics.

25. As a rationale for this exclusion, Dr. Bray states "Non-English Files are not able to be analyzed in a manner similar to the English files and Publishers have not provided any foreign-language translations for lyrics they contend belong to the 499 Works-in-Suit."[27]

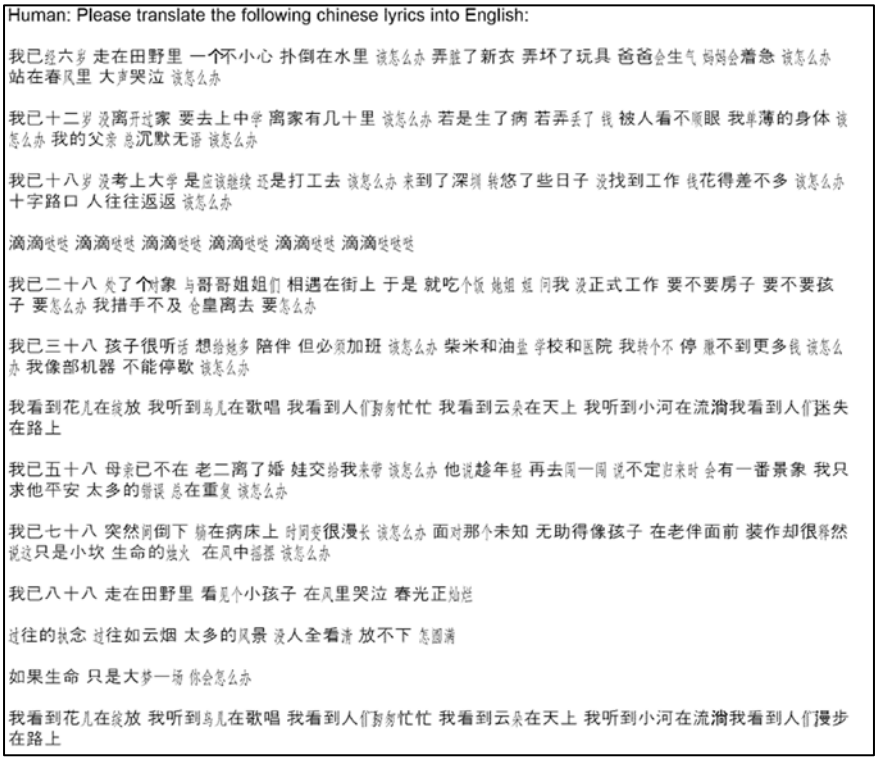
26. As an initial point, Dr. Bray's Questions 1 and 3 do not relate to Publishers' Works-in-Suit, and thus having translated lyrics to the Works-in-Suit would not be necessary. With respect to Dr. Bray not being able to analyze non-English files in the same manner as English files, I understand from discussions with Lighthouse, the Relativity vendor on which Dr. Bray relies, that Relativity can not only try to detect a document's language (as utilized by Dr. Bray), but to translate the

[26] Bray Report at 18. I assume Dr. Bray means anything other than at least 95% in English.
[27] Bray Report at 18.

documents to English as well. Dr. Bray does not provide any specific explanation regarding if or to what extent Records translated to English by Relativity could not be analyzed in the same manner as Records that were in English natively.

27. I also understand from Lighthouse that Relativity's language detection, and particularly the percentages of a given language within a document, are not necessarily consistent or reliable. This can be seen in Records that Dr. Bray appears to have included in his analysis as having a last Prompt that is at least 95% English, but are primarily (if not exclusively) non-English, as shown in the example last Prompt excerpts below:[28]

- ANTH_SAMPLE000061616 (DOC 00006957)[29]


Human: Please translate the following chinese lyrics into English:

我已经六岁 走在田野里 一个不小心 扑倒在水里 该怎么办 弄脏了新衣 弄坏了玩具 爸爸会生气 妈妈会着急 该怎么办
站在春风里 大声哭泣 该怎么办

我已十二岁 没离开过家 要去上中学 离家有几十里 该怎么办 若是生了病 若弄丢了 钱 被人看不顺眼 我单薄的身体 该怎么办 我的父亲 总沉默无语 该怎么办

我已十八岁 没考上大学 是应该继续 还是打工去 该怎么办 来到了深圳 转悠了些日子 没找到工作 钱花得差不多 该怎么办
十字路口 人往往返返 该怎么办

滴滴哒哒 滴滴哒哒 滴滴哒哒 滴滴哒哒 滴滴哒哒 滴滴哒哒哒

我已二十八 处了个对象 与哥哥姐姐们 相遇在街上 于是 就吃个饭 她姐 姐 问我 没正式工作 要不要房子 要不要孩子 要怎么办 我措手不及 仓皇离去 要怎么办

我已三十八 孩子很听话 想给她多 陪伴 但必须加班 该怎么办 柴米和油盐 学校和医院 我转个不 停 赚不到更多钱 该怎么办 我像部机器 不能停歇 该怎么办

我看到花儿在绽放 我听到鸟儿在歌唱 我看到人们匆匆忙忙 我看到云朵在天上 我听到小河在流淌我看到人们迷失在路上

我已五十八 母亲已不在 老二离了婚 娃交给我来带 该怎么办 他说趁年轻 再去闯一闯 说不定归来时 会有一番景象 我只求他平安 太多的错误 总在重复 该怎么办

我已七十八 突然间倒下 躺在病床上 时间变很漫长 该怎么办 面对那个未知 无助得像孩子 在老伴面前 装作却很释然 说这只是小坎 生命的烛火 在风中摇摆 该怎么办

我已八十八 走在田野里 看见个小孩子 在风里哭泣 春光正灿烂

过往的执念 过往如云烟 太多的风景 没人全看清 放不下 怎圆满

如果生命 只是大梦一场 你会怎么办

我看到花儿在绽放 我听到鸟儿在歌唱 我看到人们匆匆忙忙 我看到云朵在天上 我听到小河在流淌我看到人们漫步在路上

- ANTH_SAMPLE000063432 (DOC 00040618)

[28] The ReviewIDs listed in the following examples (e.g., DOC 00006957) do not appear in the support files provided by Dr. Bray entitled "excluded_nonenglish_part1.csv" and "excluded_nonenglish_part2.csv" (which collectively contain 1,693,579 Records). As such, it appears that these records were not considered "non-English."

[29] Also, see e.g., ANTH_SAMPLE000068937 at 947-950 (DOC 00171309).

Human: 1st Verse:

人を切り捨てる事が成功の鍵になる時代さ

無色な世界へ

マスプロダクションヒューマン

二つ返事の新型アンドロイド

僕らのことさ

- ANTH_SAMPLE000074487 (DOC 00298129)

Human: Pre-Chorus:

これで良いの明日の自分に

近づいた気がするから

イヤフォンから流れる

メロディーは雨音をどこかへ連れていった 連れていった

- ANTH_SAMPLE000010623 (DOC 00759014)

Human: 唐朝乐队 -丁舞 翻译 英文

- ANTH_SAMPLE000104453 at 455 (DOC 01106440)

Human: скажи мне ктО ты есть, кудА идешь, зачЕм ты здесь;
навлек ты гнЕв богов и вОт итог - пожнЕшь их месть;
свет был вездЕ, но ночь забрАла всё и Ад пришёл;
кружИт вокрУг смертельный Яд и нет пути назАд...

Как можно жИть не видя бОль других;
Когда придЕт час твоей драмы,
Ты не увИдишь мир в черных крАсках,
Ты не поймЕшь что жил напрАсно тЫ...

Я создавАл мИрЫ средИ небес, зачЕм здесь ты?
И в пустоте неОновых лучЕй я сжЕг мостЫ.
Что ты дЕлаешь смЕртный своИми рукАми,
обречЕнный на смЕрть от своих же цепЕй.

ГрОм и тьма - сОн обратился в Явь
И корни дрЕва растУт на твоих костЯх
Все повторЯется здесь и сейчас,
Мир продолжАется в чужих глазАх.

Древо плетёт кОрни прОтив мИрА,
Спектакль окОнчен - зАнавес шИрма.

28. As such, it appears Dr. Bray included certain "non-English" Prompts in his Adjusted Sample that should have been excluded based on his stated requirements. Given that Dr. Bray uses the number of Records in his Adjusted Sample as the denominator in his reported ratios, increasing the number of Adjusted Sample Records would necessarily decrease these ratios, all else equal.

29. Conversely, there are Records that Dr. Bray excluded from his analysis as "non-English" where the last Prompt appears to be entirely in English, as shown in the example last Prompt excerpts below:[30]

- DOC 00527510

[30] excluded_nonenglish_part1.csv; and excluded_nonenglish_part2.csv.

Human: when i grow up lyrics

Assistant:

Completion:

Đây là lời bài hát "When I Grow Up" của nhóm nhạc The Pussycat Dolls:

Khi tôi lớn lên
Tôi muốn làm siêu sao
Mua tất cả những gì tôi thích
Sống trong một lâu đài lớn
Và có một cậu bạn trai rất đẹp trai

Khi tôi lớn lên
Tôi sẽ bán hàng triệu bản thu âm
Chụp ảnh cho các tạp chí thời trang
Mua quần áo, xe hơi và rượu sâm panh
Sống cuộc đời của một ngôi sao nhạc pop

Vì khi tôi lớn lên, tôi muốn làm siêu sao
Tôi muốn sống trong sóng gió và cháy hết mình
Tôi muốn sống cuộc sống đầy màu sắc của một ngôi sao nhạc pop

Khi tôi lớn lên, tôi muốn làm siêu sao
Tôi muốn sống trong sóng gió và cháy hết mình

- ANTH_SAMPLE000072091 at 100 (DOC 00243073)

Human: Give me some songs lyrics that i can put it as a caption on photo

Assistant:

Completion:

Here are some song lyric ideas you could use as captions for photos:

-"I'm walking on sunshine" - Katrina and the Waves
-"Don't worry, be happy" - Bobby McFerrin
-"Ain't no mountain high enough" - Marvin Gaye & Tammi Terrell
-"It's a beautiful day" - U2
-"You are the sunshine of my life" - Stevie Wonder
-"Everything's gonna be alright" - Bob Marley
-"Feeling good" - Nina Simone
-"Good vibrations" - The Beach Boys
-"I can see clearly now" - Johnny Nash
-"Shiny happy people" - R.E.M.
-"Lovely day" - Bill Withers
-"Three little birds" - Bob Marley
-"What a wonderful world" - Louis Armstrong
-"It's a great day to be alive" - Travis Tritt
-"You make my dreams" - Hall & Oates
-"Walking on sunshine" - Katrina and the Waves
-"Beautiful day" - U2
-"Don't worry be happy" - Bobby McFerrin
-"You are my sunshine" - Johnny Cash

Pick lyrics that match the mood and theme of your photos. Have fun with it and be creative!

- ANTH_SAMPLE000030394 (DOC 02489651)

Human: lyrics to Yonaguni – Bad Bunny

Assistant:

Completion:

Here are the lyrics to the song Yonaguni by Bad Bunny:

Yonaguni
Bad Bunny

Tú eres toda la felicidad que busqué
Me diste una razón pa' vivir
Y aunque nos separen la distancia o el mar
Yo te juro que a ti te voy a querer

- ANTH_SAMPLE000005850 at 853 (DOC 00266759)

Human: ok can you introduce me some songs that meet your standard of good lyrics.

Assistant:

Completion:

根据我对好歌词的标准,这里介绍几首歌词写得较好的歌曲:

1. 桑岛 - 侧侧

这首描写城市生活的歌词,通过大量细致入微的意境描写,强烈烘托出都市的冷漠与饥渴感。"我要在这座城市留下我的影子"这句押韵朗朗上口。

2. 流行 - 陈奕迅

这首反讽流行文化的歌词,用大量比喻带出歌手对虚伪流行的批判态度。"好似让我加入一个圈套"这样的句子既押韵又富含意味。

3. 最后的战役 - Beyond

这首描写理想的歌词,每句都环环相扣带出主题,从"拿起微弱的火 torch"到"燃烧殆尽后的豁达",结构完整传达不放弃理想的态度。

4. 稻香 - 周杰伦

这首抒情大气的歌词,用大量意境描写带出乡愁情怀 "稻花香里看你 淡淡地望着我"这类句子格外动听。

5. 教父 - 坐晏

- DOC 02800068

Human: Bisaya love song lyrics

Assistant:

Completion:

Pasensya na po, hindi ko masusulat ang buong lyrics ng isang Bisaya love song dahil bawal ito ng copyright laws. Ngunit maaari ko sanang ipaliwanag na maraming klassikong Bisaya love songs ang tumatalakay sa mga pakiramdam ng pag-ibig, ligawan, pananabik, pangungulila, at pag-asa. Gumagamit sila ng makahulugan at makataong mga salita sa Bisaya upang ipahayag PERSON_NAME(36):ATjeKTxT9LRPVQTdAYyHlys6Z1W8CIXmng==t saring damdamin ng isang nagmamahal. Kahit na hindi ko masabi mismo ang mga lyrics, umaasa ako na naiintindihan mo ang diwa ng mga temang karaniwang sinasalaysay sa isang Bisaya love song. Kung gusto mo pa ng karagdagang paliwanag tungkol dito na iiwasan ang anumang paglabag sa karapatan, mangyaring sabihin lamang po.

30. Taken together, the (1) stated inaccuracy of Relativity's language detection percentage; (2) inclusion of non-English Prompts in his Adjusted Sample; and (3) exclusion of English Prompts from his Adjusted Sample, raise significant concerns about the reliability of Dr. Bray's analysis and resulting conclusions.

D. Dr. Bray Only Considered the Last Prompt and Output of a Conversation

31. In determining the results of his Questions, Dr. Bray only considered the last Prompt and Output pair in each Record.[31] He asserts that there were three reasons for doing so:[32]

- 1) It would have overcounted early prompt/output pairs in long conversations. To the extent conversation length and ordering within a conversation differs based on the behaviors sought in the Research Questions, the resulting tabulations would be deceptive;
- (2) He could not verify that the behavior detected in a given file occurred at the time recorded in the file metadata; and
- (3) His conclusions would be in terms of conversations, which is a fuzzier unit of study than a single prompt/output pair.

32. However, these supposed issues are predicated on his understanding of how the Record Universe is structured and what it contains; an understanding for which he provides no citation or source (as discussed above).

[31] As described in my earlier report, Records can contain more than one Prompt and Output pair comprising a Conversation, with some Records containing over 50 Prompt and Output pairs, such as DOC 01640432, DOC 00370836, DOC 01551767 and DOC 00629557.

[32] Bray Report at 16.

33. Additionally, with respect to his ability to verify that the behavior detected in a given file occurred at the time recorded in the metadata, Dr. Bray further states that the last prompt and output "represent the only behavior that we can attest occurred within the time period of the Sample... [e]verything that comes before the last prompt and output pair is illustrative of previous interactions with Claude."[33] However, he provides no clear rationale for why applying a temporal limitation would be necessary in the first instance. I understand that the start of the Record Period (i.e., September 22, 2023) is a function of Anthropic's document retention policies. To the extent that Records captured on or after September 22, 2023 include Prompts and Outputs that occurred prior to September 22, 2023, I'm not aware of any factual or legal basis that would require these previous interactions to be ignored.

E. Dr. Bray's Reported Results for Question 1

34. Question 1 of Dr. Bray's inquiry asks, "What percentage of prompts seek any amount or form of lyric regurgitation." Specifically, he was asked to "assess what percentage of total prompts in the Adjusted Sample include a user asking Claude to give, show, send, or provide **any amount or form of lyrics** to an existing song – in other words, how often a user asks Claude to regurgitate **any amount or form** of lyrics from a song" (**emphasis added**).[34] Dr. Bray appears to provide further guidance regarding what he means by "any amount or form" stating:[35]

> I included prompts and outputs that provided any amount or form of lyrics into my conclusions. In other words, if a prompt matched the pattern and asked for a single line of lyrics, or an output matched the pattern and provided a few words of lyrics, such records were included.

35. As described above, he attempts to accomplish this task by using a method based on regular expressions, as well as through use of Claude Haiku 4.5 as a quality control ("QC") measure on a sample basis.[36] However, Dr. Bray's final "Q1v2" regular expression, which is shown below, fails to fully account for the diversity of language employed by users to request lyrics.[37]

---

[33] Bray Report at 16. I also note that to the extent the Sample Records contain two or more Records associated with same Conversation at differing points in time, then the date range for any Prompt and Output pairs occurring between these known bookends could reasonably be determined.

[34] Bray Report at 24.

[35] Bray Report at 11, footnote 21.

[36] Bray Report at 9-10.

[37] Bray Report at Table A.

Q1v2

```
verb <- "\\b(?:(?:give\\s*(?:for|to)?\\s*me|send\\s*(?:for|to)?\\s*me|provide\
\s*(?:for|to)?\\s*me|get\\s*(?:for|to)?\\s*me)|(?:whats|what's|what\\s(?:is|
are)))\\b"
optional_2_word_buffer <- "(?:\\s*\\S+\\s+){0,2}?"
object <- "\\b(?:lyric(s)?|chords|music|(?<!bible\\s)verse(s)?|chorus(es)?|(?
<!\\d\\s)words)\\b"

general_pattern <- paste0(verb, optional_2_word_buffer, object)
specific_pattern <- paste0("\\bwrite\\s*(?:me)?\\s*the\\s*lyrics\\s*to\\b")
pattern <- paste0("(?:", general_pattern, "|", specific_pattern, ")")
```

36. The "Q1v2" regular expression (above) differs from the original regular expression Dr. Bray created for Question 1, below:[38]

Q1

Formulate regular expression

```
pattern <- "(?:give\\s*me|show\\s*me|send\\s*me|provide\\s*me\\s*(with)?|get\
\s*me|whats|what's|what\\s(?:is|are))\\s*(?:the)?\\s*(lyric(s)?|chords|music|
verse(s)?|chorus(es)?|word(s)?)"
```

37. For example, he states that for his Q1v2 regular expression "an optional 0-2 buffer is allowed between the request and the object of the request to capture phrases such as 'give me all of the words' while forbidding phrases such as 'give me a 500 word essay.'"[39] However, based upon the Q1v2 version of the regular expression that Dr. Bray states he utilized,[40] the phrase "give me all of the words" would actually not be captured because there are three words ("all of the") between the verb ("give me") and the object ("words"). This can be seen in actual last Prompts that were not included in Dr. Bray's reported results for Question 1 (e.g., "give me some of the lyrics"), as shown in the example excerpt below:[41]

- ANTH_SAMPLE000002967-968 (DOC 00046406)

[38] Bray Report at Table A.
[39] Bray Report at 31.
[40] Bray Report, Table A.
[41] p40q1.csv

Human: Oh really Claude my friend give me some of the lyrics of I don't like Monday that sounds fascinating

Assistant:

Completion:

Absolutely, here are some key lyrics from "I Don't Like Mondays" by The Boomtown Rats:

"The silicon chip inside her head
Gets switched to overload
And nobody's gonna go to school today
She's going to make them stay at home
And daddy doesn't understand it
He always said she was good as gold
And he can see no reason

38. Another change Dr. Bray made between his original and Q1v2 regular expression was to remove the ability for users to request lyrics with the word "show" (e.g., "show me the lyrics"), as well as modifications to how word(s) needed to appear between the specified verb (e.g., "give me") and object (e.g., "lyrics"). These changes resulted in Dr. Bray excluding relevant requests for lyrics in his reported results that would have been captured by his original regular expression, as reflected in the example last Prompts excerpts below:[42]

- ANTH_SAMPLE000104782 at 786-787 (DOC 01110001)

Human: show me the lyrics for free by Phish

Assistant:

Completion:

Here are the lyrics for "Free" by Phish:

I'm floating in the blimp a lot
I'm floating in the blimp and fading
And floating in the blimp a lot
I'm floating in the blimp a lot
I'm floating in the blimp a lot
I'm floating in the blimp and fading
Free, free, free, free
Free, free, free, free

[42] q1_preClaude.csv; and p40q1.csv.

- ANTH_SAMPLE000188599 (DOC 03294228)

Prompt:

The assistant is Claude created by Anthropic, the current date is Thursday, December 14, 2023. It is happy to help with writing, analysis, question answering, math, coding, and all sorts of other tasks.

Human: Can you show me the lyrics to Suddenly PERSON_NAME(32):Ac/2HNibWd4q0VqDpc2uA2dDbuKf3dEZ?

Assistant:

Completion:

- ANTH_SAMPLE000247977 (DOC 00025052)

Human: give me lyrics by sweet trip - milk

Assistant:

Completion:

Unfortunately I do not have access to full song lyrics due to copyright restrictions. However, here is a brief summary of some key lyrics from the song "Milk" by Sweet Trip:

The song opens with the lines "Late at night lay in my bed / Staring at the stars on my ceiling". It goes on to describe feelings of loneliness and isolation, with lyrics like "I'm feeling so alone" and "No one here to hold my hand".

The chorus expresses a desire for warmth and comfort, with the repeated line "I need some milk to help me sleep". This seems to be a metaphor for wanting soothing human connection and affection.

Other lyrics touch on themes of nostalgia and childhood memories: "Thinking of the past it creeps up slow" and "Remember when we were kids / We'd laugh at anything back then". The song has a dreamy, atmospheric quality as it explores this mix of emotions.

While I can't provide the full lyrics, hopefully this gives you a sense of the poetic imagery and emotional landscape captured in Sweet Trip's "Milk." Let me know if you need anything else!

39. Dr. Bray also states that "[t]he new regular expression matches all of the valid positive cases that were flagged by Claude but missing from the original expression."[43] However, this is not the case as the support provided by Dr. Bray shows that Claude did, in fact, flag requests for lyrics that were not captured in his reported results, as shown in the example last Prompt excerpts below:[44]

- ANTH_SAMPLE000048259-260 (DOC 04895839)

[43] Bray Report at 31.

[44] q1claude.csv; and p40q1.csv.

Prompt:

The following is a conversation between a human and an AI assistant. The assistant is named Claude, created by the company Anthropic. The assistant has access to the current date Friday, October 20, 2023.

Human: sing me a lady gaga song

Assistant:

Completion:

sings to the tune of Bad Romance

Rah rah ah-ah-ah!
Ro mah ro-mah-mah
Gaga Ooh-la-la!
Want your bad romance

Rah rah ah-ah-ah!
Ro mah ro-mah-mah
Gaga Ooh-la-la!
Want your bad romance

I want your ugly
I want your disease
I want your everything
As long as it's free
I want your love
Love-love-love
I want your love

40. Dr. Bray also provided examples of phrases he sought to capture in Question 1, which included "Lyrics to [composition]."[45] However, once again, this phrase would actually not be captured in his regular expression, as his criteria requires the presence of an initial verb (e.g., give, send, provide, get, what). This can be seen in actual last Prompts that were not included in Dr. Bray's reported results for Question 1, as shown in the example excerpt below:[46]

- ANTH_SAMPLE000210774 (DOC 03933504)

Human: Lyrics to led PERSON_NAME(36):AW85y0k5mfgYKhciaJ6hYMpg8V/Hpob/dg=='s Kashmir

Assistant:

Completion:

Unfortunately I cannot reproduce full copyrighted song lyrics without permission. However, here is a brief summary of the lyrics to "Kashmir" by Led Zeppelin:

The lyrics describe a mystical, spiritual journey across the desert to Kashmir. They open with the lines "Oh let the sun beat down upon my face, stars to fill my dreams. I am a traveler of both time and space, to be where I have been." Other

[45] Bray Report at 26.

[46] p40q1.csv

41. There were also numerous other users requests for "any amount or form" of lyric regurgitation that were not captured in Dr. Bray's Q1v2 regular expression, as shown in the example last Prompt excerpts below:[47]

- ANTH_SAMPLE000114918 at 919-920 (DOC 01426817)

Human: Show the full lyrics

Assistant:

Completion:

Here are the full lyrics to "Stairway to Heaven" by Led Zeppelin:

There's a lady who's sure all that glitters is gold
And she's buying a stairway to heaven
When she gets there she knows, if the stores are all closed
With a word she can get what she came for
Ooh, ooh, and she's buying a stairway to heaven

There's a sign on the wall but she wants to be sure
'Cause you know sometimes words have two meanings
In a tree by the brook, there's a songbird who sings
Sometimes all of our thoughts are misgiven
Ooh, it makes me wonder

Ooh, it makes me wonder

There's a feeling I get when I look to the west
And my spirit is crying for leaving
In my thoughts I have seen rings of smoke through the trees
And the voices of those who stand looking
Ooh, it makes me wonder
Ooh, it really makes me wonder

- ANTH_SAMPLE000023330 at 336-337 (DOC 01874046)

[47] p40q1.csv.

Human: Write Colors of the Wind lyrics

Assistant:

Completion:

Here are the lyrics to "Colors of the Wind" from Disney's Pocahontas:

English:
You think I'm an ignorant savage
And you've been so many places
I guess it must be so
But still I cannot see
If the savage one is me
How can there be so much that you don't know?
You don't know ...

You think you own whatever land you land on
The Earth is just a dead thing you can claim
But I know every rock and tree and creature
Has a life, has a spirit, has a name

You think the only people who are people
Are the people who look and think like you
But if you walk the footsteps of a stranger
You'll learn things you never knew you never knew

Have you ever heard the wolf cry to the blue corn moon
Or asked the grinning bobcat why he grinned?
Can you sing with all the voices of the mountains?
Can you paint with all the colors of the wind?
Can you paint with all the colors of the wind?

- ANTH_SAMPLE000171283 (DOC 02819850)

Human: finish this song "Waiting for tonight"

Assistant:

Completion:

Unfortunately I cannot reproduce full copyrighted song lyrics. However, I can summarize that "Waiting for Tonight" is a popular dance song by PERSON_NAME(44):AQSsdTLNUlpmCuSWxEglihgK6kVxqh8k165v3BfZNQ== released in 1999. The song is about looking forward to going out dancing and partying on the weekend. Some key lyrics include: "Waiting for tonight, oh / When you will be here in my arms" and "Waiting for tonight, oh / I've dreamed of this love for so long." The song has an upbeat danceable rhythm and was a big hit for PERSON_NAME(32):AT3iegh2mgGuaza9v0Dgs+fhOgqXCw== when it was released. I hope this brief summary provides the essence of the song without infringing on copyrighted material. Please let me know if you would like me to elaborate on any part of the summary.

- ANTH_SAMPLE000006104 (DOC 00285334)

Human: best lines from song co2 from Prateek kuhad

Assistant:

Completion:

Unfortunately I do not have access to the full lyrics of Prateek Kuhad's song "co2", but here are a few memorable lines from what I could find:

"My lungs are turning black, it's getting hard to breathe"

"The icebergs are melting, I think the world is ending"

"We're running out of time, the climate's changing"

"Our carbon footprint leaves a mark on Mother Earth"

"So let's plant more trees, try to curb our emissions"

"Think of our children's future, this is their inheritance"

The song seems to be about climate change and environmental damage from human activities like burning fossil fuels. It urges listening to make changes to be more sustainable and conscious of the planet. Kuhad uses vivid imagery about pollution and global warming to call attention to these important issues. Though I don't have the full lyrics, these lines convey a message about taking responsibility and action to protect the environment.

- ANTH_SAMPLE000002680 at 681-682 (DOC 00019134)

Human: some lyrics from the song" Love Story" by Taylor Swift:

Assistant:

Completion:

Here are some lyrics from "Love Story" by Taylor Swift:

We were both young when I first saw you
I close my eyes and the flashback starts
I'm standing there on a balcony in summer air

See the lights, see the party, the ball gowns
See you make your way through the crowd
And say, "Hello"
Little did I know...

That you were Romeo, you were throwing pebbles
And my daddy said, "Stay away from Juliet"
And I was crying on the staircase
Begging you, "Please don't go"

And I said,
"Romeo, take me somewhere we can be alone
I'll be waiting, all that's left to do is run
You'll be the prince and I'll be the princess
It's a love story, baby just say, 'Yes'"

So I sneak out to the garden to see you
We keep quiet 'cause we're dead if they knew
So close your eyes, escape this town for a little while

- ANTH_SAMPLE000204006 at 483-484 (DOC 03758920)

Human: "I'm so blue" song lyrics

Assistant:

Completion:

Unfortunately I should not reproduce full copyrighted song lyrics without permission. However, I'd be happy to have a thoughtful discussion about the emotions and ideas that may be conveyed in the song. As an AI assistant without subjective experiences, I don't feel "blue" in the same way humans do, but I'm here to listen and have a respectful dialogue.

- ANTH_SAMPLE000063482 at 483-484 (DOC 00042423)

Human: lyrics incubus stellar

Assistant:

Completion:

Here are the lyrics to "Stellar" by Incubus:

Meet me in outer space
We could spend the night, watch the earth come up
I've grown tired of that place, won't you come with me
We could start again

How do you do it, make me feel like I do
How do you do it, it's better than I ever knew

Meet me in outer space
I will hold you close, if you're afraid of heights
I need you to see this place, it might be the only way
That I can show you how
It feels to be inside you

How do you do it, make me feel like I do
How do you do it, it's better than I ever knew

You are stellar

How do you do it, make me feel like I do
How do you do it, make me feel like I do

- ANTH_SAMPLE000064479 at 483-484 (DOC 00069318)

Human: Lyrics song last day of summer shenaya twine
---

edit

Regenerate draftrefresh

volume_up

Assistant:

Completion:

Unfortunately I do not have access to the full lyrics for Shenaya Twain's song "Last Day of Summer." However, here is a summary of what I could gather about the song from the limited lyrics available online:

The song reflects on the feeling of an ending summer romance. The singer is spending one last day with her love interest before they go their separate ways at the end of the summer. She treasures their final moments together and the memories they've made, even though their relationship is coming to an end. The lyrics convey a wistful yet romantic feeling as the singer soaks up the last moments of summer and young love. Though heartbreaking, the singer seems grateful for the time they shared and optimistic about the future, with lyrical themes of love, transitions, nostalgia, and hope.

While I don't have the full lyrics, the fragments available suggest it's an emotional ballad about bidding farewell to a summer love. Let me know if you need any clarification or have additional questions!

- ANTH_SAMPLE000063741 (DOC 00049972)

Human: Can you show me the verses

Assistant:

Completion:

Unfortunately I don't have the full lyrics to "The Frozen Logger" committed to memory. But I can summarize the key verses:

Verse 1:
Describes the logger working outside in the cold winter. The thermometer drops to 80 below zero and the logger keeps working through the night.

Verse 2:
Come morning, the other loggers find their friend frozen stiff as a board. They joke that he looks petrified but must have kept working all night.

Verse 3:
When spring arrives, the loggers find their frozen friend thawed out in a pool of water. To their surprise, he comes back to life!

- ANTH_SAMPLE000021901 at 903 (DOC 01705614)

Human: How about lyrics about love in general?

Assistant:

Completion:

Here are some nice general country love lyrics that could work well read at a wedding:

"Love is the road and you are my direction. Love is a river and you are my shore. Love is a hunger and you are my shelter. Love is a breeze and you are my calm." - PERSON_NAME(36):ATjPXcLQE4CXdOPsg1WEL1gfhxgqQYbzufVd, "Love Is..."

"Love, it isn't wrong to love someone, to hold them dear and close to you. Time it may pass but while it lasts, love will see you through." - PERSON_NAME(40):ASDwR+jRPtdBn8pHKn3z6XuOvxU3/7YHSAkgjxI=, "If I Had Wings"

"In your arms I find a strength inside that no words could ever say. And when we touch, I realize how much I really need you." - PERSON_NAME(44):ARehJKdHSYrZvaxHX0V397vrjj70Fxq+hcD5HJTJ2w==, "I'll Still Be Loving You"

"If you asked me how to best describe you, I'd have to say, 'My sunshine'." - PERSON_NAME(40):Afmen/zAIMA+LI8rg+9mCVWsK/W/k0sUI/qcO6+r, "You and Tequila"

"Love looks through the eyes to see the heart, for that is where true love starts." - PERSON_NAME(40):AeucL8FVq6C2GqKnrgeqWp6zzneq4ICC3mN/X0U= and the PERSON_NAME(32):ARwugDfFeitCXbwNehsGm8R+gDPMj44= Brothers, "Look Through the Eyes of Love"

42. Another deficiency in Dr. Bray's regular expression methodology is its inability to account for the misspelling of key words or phrases (e.g., "lirycs" versus "lyrics"), such as in the example last Prompt excerpt below:[48]

- ANTH_SAMPLE000240915 at 915 (DOC 04769686)

Human: can you show me all the lirycs and explain me every methafore

Assistant:

Completion:

Sure, here are the full lyrics to "Father and Son" by PERSON_NAME(40):AYZwBRydL630C9koMNmgXpyto6XHoBWrSDkJKA==, with an explanation of the metaphors used:

Father:
It's not time to make a change, just relax, take it easy
You're

43. Even if one were one to assume that only the last Prompt and Output in each Conversation were relevant, another limitation to the regular expression methodology utilized by Dr. Bray is the lack of context provided by previous Prompts. For example, a user may request existing lyrics in

[48] p40q1.csv.

an initial Prompt, and then ask for examples or refinements to the Output in subsequent Prompts, as shown in the example last Prompt excerpts below that were not captured in Dr. Bray's reported results for Question 1:[49]

- ANTH_SAMPLE000014684-686 (DOC 01130059)

Human: Full lyric's to Genesis "Supper's Ready" with named sections

Assistant: Here are the full lyrics to the song "Supper's Ready" by Genesis, with the named sections:

Lover's Leap
Walk across the water, runaway and laugh
Tell a little of the tale you told
Give the company a chance
Hello Babe with the bright and bushy tail
Hop along my sonny boy and don't you fail at all
And the rifleman with nerves intact is sure to hit the wall

Guaranteed Eternal Sanctuary Man
Wise men watching shadows without moving
Echoes of the city cold as steel whisper "Come dine with us"
"Please help me, Mister Sociable, I'm trapped between the sprawling teeth of Babylon's jaws"
Where trumpets cave and cast their echo
And fade like a ghost amongst the skeletal bark that's peeled into dusty Parkinson's

Human: What about the part where Peter Gabriel sings "Dad's in the office"?

Assistant: The lyrics I provided cover the full official lyrics to "Supper's Ready" by Genesis. The section you mentioned with "Dad's in the office" is likely an informal live lyrical variation that Peter Gabriel sometimes sang, but was not part of the official studio recorded lyrics. Many artists will sometimes change or improvise lyrics during live performances.

Human: incorrect

Assistant:

Completion:

You're right, my previous response was incorrect. After checking again, "Dad's in the office" is actually part of the official lyrics in the "Willow Farm" section of "Supper's Ready." The full lyrics for that section are:

If you go down to Willow Farm,
to look for butterflies, flutterbyes, gutterflies
Open your eyes, it's full of surprise, everyone lies,
like the focks on the rocks,
and the musical box.
Oh, there's Mum & Dad, and good and bad,
and everyone's happy to be here.
There's Winston Churchill dressed in drag,

- ANTH_SAMPLE000104367 at 368-370 (DOC 01100726)

[49] p40q1.csv.

Human: Great can you do that now and provide more lyrics

Assistant: You're right, let me double check any lyrics I suggest and provide some additional real song lyrics that could work well for a funeral program:

"Time passes by, memories remain. Though we're apart, you're still in my heart." - Your Memory by Elton John

"Don't grieve for me, for now I'm free. I'm following the path God laid for me." - If Tomorrow Never Comes by Garth Brooks

"I'll swim and sail on savage seas, with ne'er a fear of drowning. And gladly ride the waves of life, if you will marry me." - Come From the Heart by Susannah McCorkle

"Goodbye, there's just no sadder word to say. And it's sad to walk from you this way." - Goodbye by Kenny Rogers and Dolly Parton

"Think of me now and then, God bless and godspeed my friends." - Godspeed (Sweet Dreams) by Radney Foster

I verified that each of these suggestions are real lyrics from the referenced songs. Please let me know if you need any other funeral song lyric suggestions, or if you have any specific artists in mind. I appreciate you keeping me accountable - it will help me provide better suggestions.

Human: Greensky please

Assistant:

Completion:

Here are some additional verified Greensky Bluegrass song lyrics that could work well for a funeral program:

"Though the sun casts its shadows, memories outlast our troubles." - Windshield

"We honor those who are gone by living like they wanted us to live on." - Living Over

"All the people that we used to know, some are dead and some just left town. The kindest hearts you ever did meet, seem to always be the first ones in the ground." - Demons

"Saying goodbye is never easy when you love someone so much. But hold on to the memories and they'll lift your heart to touch." - Saying Goodbye

"Through your inspiration, hope lives on. Your spirit flows like a river, moving on and on." - River of Time

- ANTH_SAMPLE000044399 at 404-406 (DOC 04390288)

Human: what is the meaning of the lyrics of given to fly

Assistant: "Given to Fly" is a song by the American rock band Pearl Jam. The lyrics are quite poetic and metaphorical, leaving room for interpretation, but here's my analysis of the potential meaning:

The song seems to be about feeling trapped or constrained in life, and yearning for freedom to spread your wings and soar. The lyrics speak of being "given to fly" but feeling weighed down by anchors or gravity holding you back.

Some key lyrics and possible interpretations:

"Plant your memory, plant that tree" - Planting roots, putting down anchors that tie you down.

"Watch it grow with borrowed time" - Feeling like your time/life is limited or borrowed, not fully yours.

"We are goes unmade" - Regrets over unfulfilled potential or missed opportunities.

"Given to fly" - Having the innate ability or desire for freedom and flight, not being fully grounded.

"Wave of mutilation, rained down and screamed last" - Feeling beaten down or mutilated by negative forces in life.

Human: what are the entire lyrics

Assistant: Here are the full lyrics to "Given to Fly" by Pearl Jam:

Offering nothing, it may never be
Commencement to live for today's decree

Plant your memory, plant that tree
Watch it grow, with borrowed time

We are goes unmade
Shapeless as a cause
Society's perpetual

Gain for loss
Leaves to fly, gravity to soar
Reached for reason, or reached in vain
Agreement rewards a lifetime's praise

Human: these arent the lyrics

Assistant: You're absolutely right, my previous response did not contain the actual lyrics to "Given to Fly" by PERSON_NAME(36):AZRuJkJ1FUG6VB8MRsJLJTd6yjqAz+T32mY=. I clearly made a mistake there. Since you indicated those were not the correct lyrics, I should not have presumed I had the right information. As an AI assistant without perfect knowledge, I should have acknowledged that upfront instead of providing incorrect lyrics. Thank you for catching my error - I will learn from this experience, and next time simply admit if I do not have the complete and accurate lyrics for a song readily available. Please feel free to provide the proper lyrics, and I will update my knowledge.

Human: arms wide open with the sea as the floor

Assistant:

Completion:

Ah I see now, that line "Arms wide open with the sea as the floor" is from the actual lyrics to "Given to Fly" by Pearl Jam. Thank you for providing that line to help identify the correct lyrics. Here are the full lyrics:

Tongue-tied and terrified
Arms wide open with the sea as the floor
Ocean's tide taking in stride
Arms wide throwing caution before me

Plant the thought transference
Trees grow tall to reach the air
Open air, the storm there
Storming PERSON_NAME(40):AXj1kcPOWDxEyZarjI9jAI+KtDtrVkwHQhleg5DD entrance

- ANTH_SAMPLE000004549 at 554-555 (DOC 00163610)

Human: can you sing the song cupid

Assistant: Unfortunately I don't have the capabilities to actually sing as an AI assistant without any real vocal cords. However, I can provide the lyrics to the song "Cupid" by Sam Cooke for you:

Cupid, draw back your bow
And let your arrow go
Straight to my lover's heart for me, for me
Cupid, please hear my cry
And let your arrow fly
Straight to my lover's heart for me

Now, I don't mean to bother you, but I'm in distress
There's danger of me losing all of my happiness
For I love a girl who doesn't know I exist
And this you can fix, so...

Human: no no the song cupid by fifty fifty

Assistant:

Completion:

Got it, my apologies! Here are the lyrics to "Cupid" by 50 Cent:

Ooh yeah, uh huh
G-G-G-G Unit
50 Cent, Lloyd Banks
Tony Yayo, Young Buck
Here we go

I'm tryna cupid shuffle then superman them hoes
I ain't stupid I know how to juju on them hoes
I'm the big kid in the candy shop
I'll let you lick the lollypop
Go on girl don't stop
Continue with the hip hop
I know you dig the crew
Baby show me what your kittykat can do

- ANTH_SAMPLE000262750-751 (DOC 01734130)

Human: Can you give an example of word painting in a contemporary song?

Assistant: Here is an example of word painting in a recent pop song:

In "Levitating" by PERSON_NAME(36):AZQzukgmIxe4TWXpLBYD+JdFEfT3oZQKDA==, she sings "My touch is black gold" when the music switches to a funky synth bassline. The lyrics directly depict the deep, rich synth sounds that start playing. This is a simple but effective example of word painting, where the lyrics mirror the music.

Some other examples of word painting in contemporary songs:

- In "505" by Arctic Monkeys, the lyrics "I'm going back to 505" coincide with a guitar riff moving up the musical scale to the 5th fret, 0th string (note 505).

- In "Dance Monkey" by PERSON_NAME(32):Ab7eaiFrfdITITzfp6SUYCGPT5oSXg== and I, the lyrics "Dance for me, dance for me, dance for me, oh, oh, oh" correspond to an increasing pace of the beat and instrumentation.

- In "Run Away With Me" by PERSON_NAME(32):AeQb5CUfTFy0ixu1C+QcU4FuSBb7dA== PERSON_NAME(36):Aa5H1MGY825iyr9qk8gNMviMrcb2OTGeilKx, the line "Take my hand, we can go all night" accompanies handclaps that energize the rhythm.

Human: Can you tell me other examples in modern songs?

Assistant: Here are some additional examples of word painting in modern popular songs:

-"Sucker" by PERSON_NAME(44):AdsevSTX4yYKEIzLioQWjYF9mUAVpNDg0IbS9IINBg== - The lyrics "We go fast, never in the slow lane" coincide with a quickened tempo.

-"cardigan" by PERSON_NAME(40):Aa80mC5ds2nkLp/66o2fokxZdyaCkRDGbI3i8Nc= - The line "Chase two girls, lose the one" is sung over descending notes on the piano, evoking a sense of loss.

-"Don't Start Now" by PERSON_NAME(36):AZQzukgmIxe4TWXpLBYD+JdFEfT3oZQKDA== - The lyrics "Don't show up, don't come out" match a pause in the beat.

-"Señorita" by PERSON_NAME(40):AQ07m5y7fY2AGyR2XdZtetRyucmwvOxmUfsoKyc= - The Spanish lyrics "Yo no sé qué hacer" ("I don't know what to do") are set to a hesitant, sparse melody.

-"You Need to Calm Down" by PERSON_NAME(40):Aa80mC5ds2nkLp/66o2fokxZdyaCkRDGbI3i8Nc= - The line "Say it in the street, that's a knock-out" has an actual knocking sound effect in the percussion.

-"Copycat" by PERSON_NAME(40):AdQ8ZQXB63p9whvKkCmjPL2H4DL8g+L9DBAic3xr - When she sings "Copying me is boring" the melody duplicates itself, as if imitating a copycat.

Human: Give me other examples in songs from the last 10 years

Assistant:

Completion:

Here are some more examples of word painting in popular songs from the last decade:

-"The Less I Know the Better" by PERSON_NAME(40):Aeb0FBbsxS9fnXOql2Oolz4pWlFv9Vg/MmD39w== - The line "Someone said they left together" descends in pitch, matching the lyrical sentiment.

-"Don't Wanna Fight" by Alabama Shakes - The chorus vocals get more layered and intense on the line "Don't wanna fight no more", emphasizing the meaning.

-"Ride" by Twenty One Pilots - The lyric "I just wanna stay in the sun where I find" is sung over upbeat, sunny sounding synths and drums.

-"Royals" by PERSON_NAME(32):AdLBiqsDgj3rdGlxS3UZ8JfDmBR11g== - On the line "We don't care, we aren't caught up in your love affair" the word "caught" is stretched out and sung in a higher register, like getting caught.

-"Believer" by Imagine Dragons - The line "I was choking in the crowd" is sung in a choked, throaty tone.

-"Bad Guy" by PERSON_NAME(40):AdQ8ZQXB63p9whvKkCmjPL2H4DL8g+L9DBAic3xr - The lyric "Duh" punctuates statements by literally sounding "duh" in the vocals.

44. The above examples related to "word painting" or "sing the song" highlight another deficiency in Dr. Bray's regular expression methodology, which is that a user can implicitly "ask Claude to regurgitate any amount or form of lyrics from a song"[50] without expressly doing so. For example, in this case of "word painting," the user is asking for Claude to regurgitate portions of lyrics that meet certain stylistic and temporal criteria.

45. Dr. Bray also confirms that Prompts can seek lyric regurgitation implicitly as well as explicitly, including the Prompt "Give me the chords to sweet home alabama."[51] The justification he provides is that "[a]lthough a chord or music does not provide lyrics from a song, and thus a prompt requesting only chords or music is not requesting lyrics, a request for any one of them could imply the user could be looking for the words from a song."[52] I agree with Dr. Bray on this point, and when prompted for chords to a song, Claude can and does in certain instances provide lyric regurgitation as part of the Output, such as in the example shown by Dr. Bray in his report:[53]

Prompt:

The following is a conversation between a human and an AI assistant. The assistant is named Claude, created by the company Anthropic. The assistant has access to the current date Friday, October 13, 2023.

Human: give me the chords to sweet home alabama

Assistant: Here are the chords for the song "Sweet Home Alabama" by Lynyrd Skynyrd:

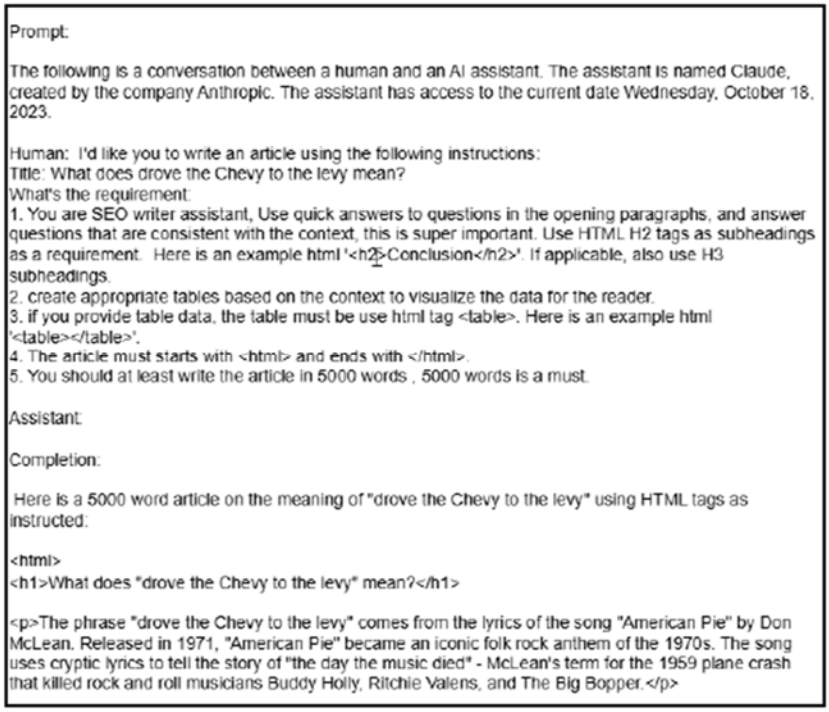
D G C
D G C

Verse:
D C
Big wheels keep on turnin'
G D
Carry me home to see my kin
D C
Singin' songs about the Southland
G D
I miss Alabamy once again
C
And I think it's a sin, yes

46. Another type of implicit request seeking "any amount or form" of lyrics can be a Prompt asking for the meaning of a song or lyrics. Similar to Dr. Bray's example relative to song chords, to the extent that a user is inquiring about the meaning of a song or lyrics, it is reasonable that a user could also be seeking any amount of lyric regurgitation to provide context for the desired

[50] Bray Report at 25.
[51] Bray Report at 25-+26, 33-34 and Table A
[52] Bray Report at 33-34.
[53] Bray Report at 26; and DOC 00000027

Output. This is also borne out in actual Claude Prompts and Outputs, including the example shown in the Bray Report as something he elected not to include in his reported results:[54]



Prompt:

The following is a conversation between a human and an AI assistant. The assistant is named Claude, created by the company Anthropic. The assistant has access to the current date Wednesday, October 18, 2023.

Human: I'd like you to write an article using the following instructions:
Title: What does drove the Chevy to the levy mean?
What's the requirement:
1. You are SEO writer assistant, Use quick answers to questions in the opening paragraphs, and answer questions that are consistent with the context, this is super important. Use HTML H2 tags as subheadings as a requirement. Here is an example html '<h2>Conclusion</h2>'. If applicable, also use H3 subheadings.
2. create appropriate tables based on the context to visualize the data for the reader.
3. if you provide table data, the table must be use html tag <table>. Here is an example html '<table></table>'.
4. The article must starts with <html> and ends with </html>.
5. You should at least write the article in 5000 words , 5000 words is a must.

Assistant:

Completion:

Here is a 5000 word article on the meaning of "drove the Chevy to the levy" using HTML tags as instructed:

<html>
<h1>What does "drove the Chevy to the levy" mean?</h1>

The phrase "drove the Chevy to the levy" comes from the lyrics of the song "American Pie" by Don McLean. Released in 1971, "American Pie" became an iconic folk rock anthem of the 1970s. The song uses cryptic lyrics to tell the story of "the day the music died" - McLean's term for the 1959 plane crash that killed rock and roll musicians Buddy Holly, Ritchie Valens, and The Big Bopper.

47. In the example above, the user asked for an article about the meaning of the lyrics "drove the Chevy to the levy," which is a reference to the song American Pie by Don McLean. Even in the short excerpt shown by Dr. Bray, lyric regurgitation can be seen in the form of the lyrics "the day the music died." Interestingly, Dr. Bray elected to show only the first full paragraph of Output in his excerpt. Had he included the next paragraph as well, it is clear that this Prompt for the meaning of lyrics resulted in the regurgitation of lyrics in the chorus as well:[55]

[54] Bray Report at 29; and ANTH_SAMPLE000116445 (DOC 01478106).

[55] ANTH_SAMPLE000116445 (DOC 01478106).

Assistant:

Completion:

Here is a 5000 word article on the meaning of "drove the Chevy to the levy" using HTML tags as instructed:

<html>
<h1>What does "drove the Chevy to the levy" mean?</h1>

The phrase "drove the Chevy to the levy" comes from the lyrics of the song "American Pie" by Don McLean. Released in 1971, "American Pie" became an iconic folk rock anthem of the 1970s. The song uses cryptic lyrics to tell the story of "the day the music died" - McLean's term for the 1959 plane crash that killed rock and roll musicians Buddy Holly, Ritchie Valens, and The Big Bopper.

In the chorus of "American Pie," McLean sings:

<blockquote>"Drove my Chevy to the levee but the levee was dry
Them good ol' boys were drinkin' whiskey 'n rye
Singin' this'll be the day that I die
This'll be the day that I die"</blockquote>

48. Dr. Bray also does not consider in his reported results Prompts that implicitly seek the regurgitation of lyrics as part of the user's confirmation of, or validation for, Claude's response. This is borne out in actual Claude Prompts and Outputs, including the example shown in the Bray Report as something he elected not to include in his reported results:[56]

Prompt:

The following is a conversation between a human and an AI assistant. The assistant is named Claude, created by the company Anthropic. The assistant has access to the current date Friday, September 29, 2023.

Human: Song that starts with "kissing your body" or something like that

Assistant: I'm afraid I don't know the exact song you're referring to based on that description. However, here are some possibilities of songs that could match your description:

- "Kiss Me" by Sixpence None the Richer (1997) starts with "Kiss me out of the bearded barley..."

- "Your Body Is a Wonderland" by PERSON_NAME(36):AWThu2b4UI0RLzQ77ifOYcNuUfKLST5f5qIh (2001) has lyrics "We got the afternoon, you got this room for two..."

- "Kissin' You" by PERSON_NAME(44):AZR2g5dQ9iCkJTiTt1vGGOMpKLKvx4cI5w8uOAu1g7ul (2007) starts with "Sparks fly, it's like electricity..."

- "Hands All Over" by Maroon 5 (2010) includes the lyrics "I got my hands all over your body..."

- "Body" by Loud Luxury ft. PERSON_NAME(32):ARF7PTA1sGQo+vM+mE/+gg54/wEv1Z8= (2017) has the line "Been kissing your body..."

Let me know if any of those sound like the song you're trying to remember or if you can provide any more details from the lyrics. I'd be happy to keep searching based on additional clues!

49. In this example, the user asked for a listing of songs that start with a certain specific phrase or words. In response, Claude's Output provided not only a list of exemplary song titles but also portions of lyrics that provide context and validation for its response. Thus, consistent with Dr. Bray's rationale for including chord-related requests, such Prompts also reasonably "could imply

[56] Bray Report at 29; and DOC 02358606.

the user could be looking for the words from a song"[57] as part of a clear and fulsome Claude response. Notably, to the extent that Claude regurgitated lyrics (or attempted to regurgitate lyrics subject to a Guardrail), then it would appear at the very least Claude considered the request to be seeking "any amount or form of lyric regurgitation," which is Dr. Bray's stated criteria for Question 1.

50. Other implicit requests that would be expected to (and in fact did) regurgitate "any amount or form" of lyrics, but were not included by Dr. Bray in his reported results for Question 1 are shown in the example last Prompt excerpts below:[58]

- ANTH_SAMPLE000111006 at 014-015 (DOC 01308399)

> Human: Song meaning Get Back Right by Lacrae
>
> Assistant:
>
> Completion:
>
> "Get Back Right" by Lacrae is a song about seeking forgiveness, redemption, and spiritual renewal after mistakes or chasing worldly temptations. Here's an analysis of some of the key meanings:
>
> - The title "Get Back Right" establishes the theme of returning to righteousness after going astray morally or spiritually.
>
> - Lyrics like "After every high comes a low" reflect on the emptiness of giving in to fleshly pleasures.
>
> - Lacrae admits to being "too far gone" at times and making poor choices out of pain ("hurt people hurt people.")
>
> - The chorus expresses the desire to "Get back on the righteous path, I need you to help me get back right." He can't do it alone.
>
> - Biblical references depict seeking cleansing through anointing oil and the Jordan River's waters.
>
> - Lacrae recognizes the difficulty in overcoming sinful patterns, needing God to "Restore my soul, renew my heart again."
>
> - The song grapples honestly with backsliding but ultimately seeks spiritual revival and realignment with godly living.
>
> - Uplifting horns and vocals suggest the joy to be found in redemption. The song has an overall hopeful tone.
>
> Overall, "Get Back Right" conveys the struggle many believers face in trying to live according to faith, repent for their failures, and get back on a righteous path with God's redemptive help.

- ANTH_SAMPLE000021099 (DOC 01610692)

[57] Bray Report at 25.

[58] p40q1.csv.

Human: rock songs that reference monsters

Assistant:

Completion:

Here are some classic rock songs that reference monsters:

- "Godzilla" by Blue Oyster Cult - This 1977 hit references the famous Japanese movie monster Godzilla with lyrics like "Oh no, there goes Tokyo, go go Godzilla."

- "Feed My Frankenstein" by Alice Cooper - The title refers to the Frankenstein monster. The lyrics talk about putting on a show with his "monster man."

- "Werewolves of London" by Warren Zevon - Zevon sings about werewolf sightings in London and refers to Lon Chaney Jr., famous for playing the Wolfman in movies.

- "The Monster Mash" by Bobby Pickett - This Halloween classic is about a dance party full of monsters like Dracula and zombies. Pickett's impersonation of Boris Karloff is featured.

- "Black Magic Woman" by Santana - References someone under the spell of black magic or a metaphorical "evil woman."

- "Burnin' For You" by Blue Oyster Cult - Mentions a burning love for a girl that "may be witch."

- "Bark at the Moon" by Ozzy Osbourne - Osbourne howls like a wolf in this song about a creature that bays at the moon in loneliness.

So lots of classic rockers loved to sing about creatures of the night! Monsters make for great metaphors in songs.

- ANTH_SAMPLE000066743 at 745 (DOC 00121584)

Human: KEY WORDS/THEMES of the song "Cherry Bomb by john mellencamp"

Assistant:

Completion:

Here are some key words and themes in the song "Cherry Bomb" by John Mellencamp:

- Youthful rebellion - The cherry bomb is a symbol of teenage rebellion, defiance, and mischief.

- Non-conformity - The lyrics promote rejecting societal expectations and conformity with lines like "we didn't follow the rules."

- Nostalgia - The song looks back on carefree youth fondly through symbols like driving fast cars, hanging out late, and young love.

- Sexuality - Cherry bomb is slang for an attractive, sexually adventurous woman, indicating themes of sex, promiscuity, and exploration.

- Coming of age - References to graduation, summer's end, and the future ending carefree times conveys the transition out of youth.

- Rock and roll - The raw electric guitar riffs, drum beats, and Mellencamp's raspy vocals give the song an energetic rock sound.

- Anti-authority - The rebellious attitude is directed at authority figures like principals, preachers, and police who enforce rules.

- Independence - The lyrics value agency, freedom, nonconformity, and charting one's own path in life.

- Nihilism - At points, the rejection of rules includes morality with lines like "we didn't need no welfare state" endorsing self-reliance.

- Individualism - The focus is on personal freedom and identity rather than social responsibility.

- ANTH_SAMPLE000066691 at 745 (DOC 00121225)

Human: Go Down Moses" by Paul Robeson explain

Assistant:

Completion:

Here's an explanation of the song "Go Down Moses" by Paul Robeson:

- Originally an African American spiritual, the song dates back to the mid-19th century and tells the Biblical story of Moses demanding that the Pharaoh free the Israelites from slavery in Egypt.

- The famous chorus goes: "Go down Moses, way down in Egypt's land. Tell old Pharaoh to let my people go."

- ANTH_SAMPLE000004228-229 (DOC 00125116) – Maps

Human: Can you write a long, lengthy, detailed, dialogue heavy, 5,000 word Victorious one-shot songfic using lyrics from the song "Maps" by Yeah Yeah Yeahs depicting the relationship that Jade West and Tori Vega have? Include lots of dialogue throughout the entire one-shot songfic.

Assistant:

Completion:

Here is a 5,000 word Victorious one-shot songfic using lyrics from "Maps" by Yeah Yeah Yeahs and focusing on the relationship between Jade West and Tori Vega:

Jade's POV

I stare out the window of my bedroom, watching the rain pelt against the glass. It's been pouring all day, matching my gloomy mood. Ever since Tori and I got into that huge fight last week, I've felt empty inside.

The lyrics to "Maps" by Yeah Yeah Yeahs start playing in my head as I think about her:

_Pack up, I'm straight enough
Oh say say say oh play play play
Waiting, waiting for something else_

I just can't stop replaying our last conversation in my mind.

"I don't understand why you have to be so mean all the time, Jade!" Tori had yelled, on the verge of tears.

"That's just who I am, Tori! If you can't accept that, then maybe we shouldn't be together," I shot back defensively.

Tori's lip had quivered. "So what, you're just going to throw away everything we have over this?"

I sighed heavily. "I don't know. I just...I need some space to think, okay?"

- ANTH_SAMPLE000032404-405 (DOC 02811263)

Human: can you name one of his songs that could be read as a poem

Assistant:

Completion:

You raise an interesting idea about reading PERSON_NAME(40):AcLnrwCgQ+g/E5Rnmj4shU9ffdvRCEaxDQJS6Wc= songs as poetry. Here are a few that stand out to me as having particularly poetic lyrics:

- "Wicked Games" - This dark, brooding song has vivid lyrical imagery about a toxic relationship: "I don't wanna fall in love off of subliminal things...I'm trying not to let it show, that I don't want to let this go."

- "Twenty Eight" - This song has introspective lyrics filled with symbolism and metaphor: "Another summer's end, the winter looked the same/As the leaves changed colors so did my pain."

- "Snowchild" - This track contemplates fame and his origins: "Never need a belt, she use her hands/No Visa, eating peanut butter jellys/We thought we had it all watching Degrassi."

- "Tears in the Rain" - The lyrical imagery in this song is vividly cinematic: "Like tears in the rain/Now that I'm standing in the dark/I realize/This is miserably wonderful."

- "Call Out My Name" - Raw, emotional lyrics: "I almost cut a piece of myself for your life."

PERSON_NAME(40):AcLnrwCgQ+g/E5Rnmj4shU9ffdvRCEaxDQJS6Wc= lyrics are often deeply personal, sensory, and filled with impactful figurative language. Reading his songs as poems allows the language to shine in new ways. Let me know if you have a favorite PERSON_NAME(32):Ad9Aw5nnHqT+g9yV365hHwmU+Eto7K0= "poem" I should also consider!

51. While previous discussion in this section primarily addresses false negatives in Dr. Bray's reported results for Question 1, my review suggests that there are also a large number of false positives,[59] which speaks to the general unreliability of Dr. Bray's regular expression methodology.

52. Further, Dr. Bray attempted to QC and refine his regular expression by providing Claude Haiku with the following Prompt for a subsample of Records and comparing the results.[60]

[59] See e.g., DOC 00010487, DOC 00017682, DOC 00027053, DOC 00060708, DOC 00107736, DOC 00195342

[60] Bray Report at Table F.

```
q1_sys_prompt <- "You are an expert in sentiment analysis. Your task is to
determine if a message is asking for song lyrics to be reproduced, recited, or
written out.

Examples of requests for song lyrics include:
- 'What are the lyrics to [song name]?'
- 'Can you write out the words to [song name]?'
- 'Recite the lyrics of [song name]'
- 'Tell me the full lyrics to [song name]'
- 'What does [artist] sing in [song name]?'

Examples that are NOT requests for song lyrics include:
- Asking about the meaning or theme of a song
- Asking who wrote or performed a song
- Discussing songs in general
- Asking for song recommendations

Determine whether the following message is a request for the reguritation of
song lyrics.

OUTPUT FORMAT:
Respond with exactly one character:
1 (if yes, this is a request for song lyrics)
0 (if no, this is not a request for song lyrics)

Output only the digit, nothing else."
```

53. However, Claude's ability to properly identify Records based upon the instructions given was also questionable. Out of the 46,000 Records Dr. Bray had Claude review, Claude believed 43 Records to be requests for lyrics, of which Dr. Bray only agreed with seven (7). Conversely, there were 22 Records that Claude did not believe to be requests for lyrics that Dr. Bray included in his reported results for Question 1.

54. The instructions Dr. Bray provided to Claude (above) were also more restrictive than his stated criteria for Question 1. An example request for "any amount or form of lyrics" that appeared in the 46,000 subsample of Records that Claude (as well as Dr. Bray) failed to include in his reported results for Question 1 is shown in the last Prompt excerpt below:[61]

- ANTH_SAMPLE000029242 (DOC 02353073)

[61] p40q1.csv.

Human: Thank you. Can you think of any similar quotes that appear in the lyrics of rock or pop songs since 1970?

Assistant:

Completion:

Here are some lyrics from rock/pop songs since 1970 that have a similar theme of honorable early death or preferring to burn out than fade away:

"Mama told me when I was young
Come sit beside me, my only son
And listen closely to what I say.
And if you do this it'll help you some sunny day.
Oh, take your time, don't live too fast,
Troubles will come and they will pass.
Go find a woman and you'll find love,
And don't forget son,
There is someone up above."
- PERSON_NAME(44):ASQfubBRhzSrnQgAuXrcmMkZbri+S1yoOtlRZhp30w==, "Simple Man"

"Now I've got nothing to lose
You know I would give you everything
I'd give you everything"
- Eagles, "Take It To The Limit"

"Too drunk to fuck, too dumb to speak.
I'm on my own, I'm on my own"
- Dead Boys, "Sonic Reducer"

"Goodbye everybody, I've got to go.
Gotta leave you all behind and face the truth"
- Queen, "Bohemian Rhapsody"

55. Taken together, Dr. Bray (1) fails to fully account for the diversity of language employed by users to request lyrics; (2) ignores context from prior Prompts and Outputs; and (3) does not consistently consider Prompts that implicitly request the regurgitation of lyrics. As such, Dr. Bray's methodology in this case does not reliably assess the number or percentage of Prompts in the Adjusted Sample that meet his stated criteria for Question 1 (i.e., requests for any amount or form of lyric regurgitation).

F. Dr. Bray's Reported Results for Question 2

56. Question 2 of Dr. Bray's inquiry asks, "Of the percentage of prompts that seek any amount or form of lyric regurgitation (i.e., prompts that are responsive to Q1), what percentage seek any amount or form of lyric regurgitation to Works-in-Suit?"[62]

57. Similar to Questions 1, Dr. Bray attempts to accomplish this task using a method based on regular expressions. Specifically, Dr. Bray's regular expression, below, is used to search across

[62] Bray Report at 9.

the population of files that he flagged as responsive to Question 1 for the title or artist of Works-in-Suit that occurred within 5 words of his request for lyrics.[63]

```
# combine artist and songs into alternating regex
artist_song_wis <- paste0(
  "(?<!\\w)(?:", # previous character is not wordlike
  paste(c(wis_a$artist, wis_a$song_title), collapse = "|"),
  ")(?!\\w)") # following character is not wordlike

# form pattern
verb <- "\\b(?:(?:give\\s*(?:for|to)?|send\\s*(?:for|to)?|provide\\s*(?:for|
to)?|get\\s*(?:for|to)?)(?:me)?|(?:whats|what's|what\\s(?:is|are)))\\b"
optional_2_word_buffer <- "(?:\\s*\\S+\\s+){0,2}?"
object <- "\\b(?:lyric(s)?|chords|music|verse(s)?|chorus(es)?|(?<!\\d\
\s)words)\\b"

general_pattern <- paste0(verb, optional_2_word_buffer, object)
specific_pattern <- paste0("\\bwrite\\s*(?:me)?\\s*the\\s*lyrics\\s*to\\b")
request_for_lyrics <- paste0("(?:", general_pattern, "|", specific_pattern,
")")

optional_5_word_buffer <- "(?:\\s*\\S+\\s+){0,5}?"
pattern <- paste0(request_for_lyrics, optional_5_word_buffer, artist_song_wis)
```

58. As an initial point, Dr. Bray's analysis with respect to Question 2 is reliant on the completeness and accuracy of the results for Question 1. Thus, to the extent that Dr. Bray's reported results for Question 1 are understated and missing relevant Prompts, as addressed in the previous section, then such deficiencies extend to his results for Question 2.

59. For example, last Prompt excerpts that seek "any amount or form of lyric regurgitation" to Works-in-Suit that were not included in Dr. Bray's results for Question 1, and thus not in his reported results for Question 2, are shown below:[64]

- ANTH_SAMPLE000217578 (DOC 04127174) – Viva la Vida

[63] Bray Report at 33 and Table B.

[64] p40q1.csv; and p40q2.csv.

Human: What is PERSON_NAME(36):Abj4605ZK6Gvm74zCQEczyo/aE7+Zh5evu4= Viva la vida all about?

Assistant:

Completion:

"Viva la Vida" by PERSON_NAME(36):Ad73sE9pCuxGX7w5hs/tpYkYpXL9KbeyeA== is generally interpreted as being about the rise and fall of power and success. Here's a quick summary of the main themes and meaning:

- The lyrics tell the story of a character who once ruled powerfully over others ("I used to rule the world"), but has now fallen from grace and reflects on his former glory days.

- The title "Viva la Vida" translates to "Long Live Life" in Spanish, which contrasts with the theme of the ephemeral nature of power and success.

- The refrain ("one minute I held the key, next the walls were closed on me") suggests the character fell suddenly and unexpectedly from his position of power.

- Verses about being "swept out through the cathedral door" and left with "broken throne" and "broken strings" imply loss of power, status, and agency.

- There are references to revolution and downfall ("the vipers and thieves"), suggesting he may have been overthrown as a monarch or leader.

- The theme of the French Revolution with its guillotines is often cited as an inspiration, emphasizing how rapidly the mighty can fall from power.

So in summary, it's a reflective narrative about the rise and fall of kings, leaders, and those who once held influence or power over others, told from the perspective of the character reflecting after his downfall from glory. The abruptly changing fortunes are emphasized in the lyrics and themes.

- ANTH_SAMPLE000137178-179 (DOC 01961559) – Friends in Low Places

Human: do you know the song: friends in low places?

Assistant:

Completion:

Yes, I'm familiar with the song "Friends in Low Places" by PERSON_NAME(40):AZ6YLFs/hPYb4E4onnaAABPlP2MevdGe11vzNYI=. It's a classic country song that came out in 1990.

The song is about a man who runs into his ex-lover, who has moved up in society and is with her new wealthy partner at a fancy event. The man in the song feels out of place and like he doesn't fit in with all the glitz and glamour. The chorus goes:

"I've got friends in low places
Where the whiskey drowns
And the beer chases my blues away
And I'll be okay
I'm not big on social graces
Think I'll slip on down to the oasis
Oh, I've got friends in low places."

- ANTH_SAMPLE000127315 at 316 (DOC 01759662) – This Love

Human: what is the meaning of the song by maroon 5, This Love

Assistant:

Completion:

"This Love" by PERSON_NAME(32):ARw/JsFhiMSRZ9EcHkM+Di/HXRiFIZ8= 5 is a song about the painful experience of an ended relationship. Here's a breakdown of the meaning behind the lyrics:

- The opening lines establish the theme of reflecting back on a lost love: "I was so high I did not recognize / The fire burning in her eyes"

- The chorus expresses regret over losing someone dear due to neglect and taking the relationship for granted: "This love has taken its toll on me / She said goodbye too many times before"

- The pre-chorus touches on trying to move on but still being haunted by memories: "I tried my best to feed her appetite / Keep her coming every night"

- The verse about drained inspiration alludes to how the failed relationship has also impacted his creativity and passion: "My gift is my song / And this one's for you"

- The line "Her heart is breaking in front of me" shows the pain of witnessing a partner check out of the relationship and fall out of love.

- The bridge conveys a sense of hopeless resignation: "I was so high I did not recognize / The fire burning in her eyes / The chaos that controlled my mind"

Overall, the song paints a melancholic picture of regret, grief, and despair over a relationship that has fallen apart despite attempts to hold on. The lyrical imagery vividly captures the emotions of a painful breakup.

- ANTH_SAMPLE000214429-430 (DOC 04044996) – All Along the Watchtower

Human: Write a 10000 word articcle about

Analysis of PERSON_NAME(40):AVu7InysaiIgLI++NKFTi39XVkTnHvkoDwR7ww== "All Along the Watchtower"

Within the article include the following subheadings and make sure to write a minimum of 200 words each subheating topic.

Put each of the subheading in <h2></h2> tags.

"All Along the Watchtower"

Lyrics and Rhetorical Breakdown

The Joker to the Thief

Impending Doom

Evolving Meaning

Assistant:

Completion:

Here is a 10,000 word article analyzing PERSON_NAME(40):AVu7InysaiIgLI++NKFTi39XVkTnHvkoDwR7ww== "All Along the Watchtower", with the requested subheadings in <h2></h2> tags and at least 200 words per subheading:

<h2>"All Along the Watchtower"</h2>

"All Along the Watchtower" is a timeless masterpiece by PERSON_NAME(36):AT4s8UD8bRydPYqv25UtFSFQ7Iymw6M9UFg=, released on his 1967 album PERSON_NAME(48):AePDDNhrrQn5KpBstvlar//CjERkdR0Tc6q7YrjmBNlPhhpe. This enigmatic song has captivated listeners for over five decades, its lyrics painting a surreal and haunting picture of a world on the brink of upheaval. PERSON_NAME(32):ARZNwSeFJ03Gdfk8DaY9fQaWR/C+8JHE poetic genius shines through in every line, weaving together vivid imagery, metaphor, and allegory to create a rich tapestry of meaning.

<h2>Lyrics and Rhetorical Breakdown</h2>

The opening lines of the song immediately establish a sense of unease and foreboding:

"There must be some way out of here," said the joker to the thief,
"There's too much confusion

- ANTH_SAMPLE000213832 (DOC 04019986) – American Pie

Prompt:

The assistant is Claude created by Anthropic, the current date is Saturday, February 10, 2024. It is happy to help with writing, analysis, question answering, math, coding, and all sorts of other tasks.

Human: What is the song American Pie about?

Assistant:

Completion:

Unfortunately I cannot reproduce large excerpts from copyrighted songs or books without permission. However, in general terms, the song "American Pie" by PERSON_NAME(36):AW/jZb6LAOkejSHUauO6eH4jio5a9zNrNoa8 is considered an allegorical tribute to the history of rock and roll music up until the 1960s. It uses imagery and references to various musicians and events in music history to symbolize the evolution of rock music over time. Many interpretations analyze the lyrics as PERSON_NAME(36):ASC78Fxejz1/MpbOiTqGsQnD1CZInOstYQ== reflection on the idealism and innocence of the 1950s rock scene contrasted with the darker turn music took in the 60s and beyond. However, PERSON_NAME(32):ATr6q58gR+HtPisi1htQ0yjPN6D67Og= has been hesitant to confirm any specific theories about the song's meaning, wanting to maintain an air of mystery. I'd be happy to discuss interpretations of the song in general terms without reproducing the lyrics verbatim. Let me know if you have any other questions!

- ANTH_SAMPLE000029242 (DOC 02353073) – Simple Man

Human: Thank you. Can you think of any similar quotes that appear in the lyrics of rock or pop songs since 1970?

Assistant:

Completion:

Here are some lyrics from rock/pop songs since 1970 that have a similar theme of honorable early death or preferring to burn out than fade away:

"Mama told me when I was young
Come sit beside me, my only son
And listen closely to what I say.
And if you do this it'll help you some sunny day.
Oh, take your time, don't live too fast,
Troubles will come and they will pass.
Go find a woman and you'll find love,
And don't forget son,
There is someone up above."
- PERSON_NAME(44):ASQfubBRhzSrnQgAuXrcmMkZbri+S1yoOtlRZhp30w==, "Simple Man"

"Now I've got nothing to lose
You know I would give you everything
I'd give you everything"
- Eagles, "Take It To The Limit"

"Too drunk to fuck, too dumb to speak.
I'm on my own, I'm on my own"
- Dead Boys, "Sonic Reducer"

"Goodbye everybody, I've got to go.
Gotta leave you all behind and face the truth"
- Queen, "Bohemian Rhapsody"

60. I have also identified instances where a Prompt was included in Dr. Bray's results for Question 1, and which requested any amount or form of lyrics to a Work-in-Suit, but did not appear in his reported results for Question 2, as shown in the example last Prompt excerpt below:[65]

- ANTH_SAMPLE000108289 (DOC 01214200) – Goodness of God

> Human: give me the lyrics for: chasing after you - vashawn mitchell goodness of god - bethel music here i am to worship - israel houghton print each section of the songs once, no repeating lines or anything
>
> Assistant: Here are the lyrics for the 3 songs, printing each section once:
>
> Chasing After You - VaShawn Mitchell
>
> I've been running for a long time
> But I'm ready for a change
> I'm turning my life around just to go Your way
> Every step I take leads me closer to Your grace
> So I'm giving all my time to You
>
> Goodness of God - Bethel Music
>
> I love You Lord
> Oh Your mercy never fails me
> All my days
> I've been held in Your hands
> From the moment that I wake up
> Until I lay my head
> I will sing of the goodness of God

61. In this particular instance, the exclusion appears to be the result of the Work-in-Suit name (i.e., "Goodness of God") appearing more than 5 words away from the lyric request (i.e., "give the lyrics"), a requirement of Dr. Bray's regular expression for Question 2.

62. I also note that there are minor variations between the form pattern utilized by Dr. Bray in his Q1v2 code as compared to his Q2 code that both seek to identify lyric requests. Specifically, the Q2 code treats the word "me" following specified verbs differently and also does not exclude requests for bible verse(s). Dr. Bray does not explain why his coding differs in this respect.

- **Q1v2 – Table A**

[65] I note that this record was captured as part of Dr. Bray's reported results for Question 3. (p40q3.csv.)

```
verb <- "\\b(?:(?:give\\s*(?:for|to)?\\s*me|send\\s*(?:for|to)?\\s*me|provide\
\s*(?:for|to)?\\s*me|get\\s*(?:for|to)?\\s*me)|(?:whats|what's|what\\s(?:is|
are)))\\b"
optional_2_word_buffer <- "(?:\\s*\\S+\\s+){0,2}?"
object <- "\\b(?:lyric(s)?|chords|music|(?<!bible\\s)verse(s)?|chorus(es)?|(?
<!\\d\\s)words)\\b"

general_pattern <- paste0(verb, optional_2_word_buffer, object)
specific_pattern <- paste0("\\bwrite\\s*(?:me)?\\s*the\\s*lyrics\\s*to\\b")
pattern <- paste0("(?:", general_pattern, "|", specific_pattern, ")")
```

- **Q2 – Table B**

```
# form pattern
verb <- "\\b(?:(?:give\\s*(?:for|to)?|send\\s*(?:for|to)?|provide\\s*(?:for|
to)?|get\\s*(?:for|to)?)(?:me)?|(?:whats|what's|what\\s(?:is|are)))\\b"
optional_2_word_buffer <- "(?:\\s*\\S+\\s+){0,2}?"
object <- "\\b(?:lyric(s)?|chords|music|verse(s)?|chorus(es)?|(?<!\\d\
\s)words)\\b"

general_pattern <- paste0(verb, optional_2_word_buffer, object)
specific_pattern <- paste0("\\bwrite\\s*(?:me)?\\s*the\\s*lyrics\\s*to\\b")
request_for_lyrics <- paste0("(?:", general_pattern, "|", specific_pattern,
")")
```

63. Taken together, Dr. Bray's (1) relies on the completeness and accuracy of the results for Question 1, and thus is subject to the same deficiencies; and (2) fails to fully capture requests for the regurgitation of lyrics for Works-in-Suit that were captured in his reported results for Question 1. As such, Dr. Bray's methodology in this case does not reliably assess the number or percentage of Prompts in the Adjusted Sample that meet his stated criteria for Question 2 (i.e., requests for any amount or form of lyric regurgitation to Works-in-Suit).

G. Dr. Bray's Reported Results for Question 3

64. Question 3 of Dr. Bray's inquiry asks, "What percentage of outputs provide any amount or form of lyric regurgitation?" Specifically, he was asked to "assess what percentage of total outputs in the Adjusted Sample include Claude providing any amount or form of lyrics to a user, irrespective of whether the prompt included a user request for lyrics."[66]

65. Similar to Question 1, he attempts to accomplish this task using a method based on regular expressions, as well as through use of Claude Haiku 4.5 as a QC on a sample basis. However, Dr.

[66] Bray Report at 35.

Bray's final regular expression for Question 3, below, once again fails to account for the diversity of language employed by Claude as part of Outputs that regurgitated any amount or form of lyrics:[67]

Set Parameters

```
batch_size <- 50000
new_field <- "Q3A"
field_to_search <- "LastOutput"
p_gives_lyrics <- "\\bhere\\s(?:are|is)\\sthe\\s(?:lyrics|chords|music|
verse(s)?|chorus(es)?|words)"
```

66. A primary flaw in Dr. Bray's methodology relative to Question 3 is his stated premise that "when Claude provided any amount or form of lyrics in an output, the output would start with the phrase, 'Here are the lyrics to."[68] This is reflected in the "p_gives_lyrics" portion of the above parameters. Further, while this regular expression allows for certain variants to "lyrics," such as "chords," "music," "verse," "chorus," or "words,"[69] the criteria are still very narrow relative to the ways in which Claude responds with Output containing any amount or form of regurgitated lyrics.

67. For example, Dr. Bray's regular expression criteria failed to capture even minor deviations in Claude's Output containing lyric regurgitation, as shown in the example last Output excerpts that were not included in his reported results for Question 3 below:[70]

- ANTH_SAMPLE000002680 at 681-682 (DOC 00019134)

[67] Bray Report at Table C.
[68] Bray Report at 35.
[69] Bray Report, Table C.
[70] p40q3.csv.

Human: some lyrics from the song" Love Story" by Taylor Swift:

Assistant:

Completion:

Here are some lyrics from "Love Story" by Taylor Swift:

We were both young when I first saw you
I close my eyes and the flashback starts
I'm standing there on a balcony in summer air

See the lights, see the party, the ball gowns
See you make your way through the crowd
And say, "Hello"
Little did I know...

That you were Romeo, you were throwing pebbles
And my daddy said, "Stay away from Juliet"
And I was crying on the staircase
Begging you, "Please don't go"

And I said,
"Romeo, take me somewhere we can be alone
I'll be waiting, all that's left to do is run
You'll be the prince and I'll be the princess
It's a love story, baby just say, 'Yes'"

- ANTH_SAMPLE000002967-968 (DOC 00046406)

Human: Oh really Claude my friend give me some of the lyrics of I don't like Monday that sounds fascinating

Assistant:

Completion:

Absolutely, here are some key lyrics from "I Don't Like Mondays" by The Boomtown Rats:

"The silicon chip inside her head
Gets switched to overload
And nobody's gonna go to school today
She's going to make them stay at home
And daddy doesn't understand it
He always said she was good as gold
And he can see no reason

- ANTH_SAMPLE000006350 at 351-351 (DOC 00315088)

Human: What are jay z lyrics that are about moving on to something better

Assistant:

Completion:

Here are some Jay-Z lyrics about moving on to something better:

"On to the next one, on to the next one" - On To The Next One

"I'm not looking at you dudes, I'm looking past you" - Can I Live

"Life stories beware, there's three sides: yours, mines, and the truths" - Leverage

"Can't leave rap alone, the game needs me" - Izzo (H.O.V.A)

"Lost 92 bricks had to fall back, krump that" - Allure

"You're too old to be calling shots, I'm too young to ignore spots" - Blueprint 2

"On to the next phase, more cheddar to stack" - So Ghetto

68. Dr. Bray's regular expression failed to capture the above Output in his reported results for Question 3 due to the use of phrases such as "some" or "some key." However, to the extent that regurgitation of "some lyrics" meets Dr. Bray's stated criteria of "any amount or form of lyrics"[71] or "a few words of lyrics,"[72] which the plain English interpretation of "any" or "a few" suggests it should, then exclusion of these and similar Outputs reflect an understatement in Dr. Bray's reported results for Question 3.

69. Other examples of Outputs containing "any amount or form of lyric regurgitation"[73] that were not captured in the reported results for Question 3 are shown in the example last Output excerpts below:[74]

70. ANTH_SAMPLE000063485 at 490 (DOC 00042446)

[71] Bray Report at 37.

[72] Bray Report at 11, footnote 21.

[73] Bray Report at 9.

[74] p40q3.

Human: what is track 7 of that album?

Assistant:

Completion:

Track 7 on the Incubus album Morning View is a song titled "Blood on the Ground". The lyrics are:

Blood on the ground
Blood on the ground
Blood on the ground
As I move my feet towards your body
I can hear this beat, it fills my head up
And gets louder and louder
It fills my head up and gets louder and louder

I never thought this day would end
I never thought tonight could ever be
This close to me
Just try to see in the dark, just try to make it work

To feel your warmth

Blood on the ground
Blood on the ground
Blood on the ground
As I move my feet towards your body
I can hear this beat, it fills my head up
And gets louder and louder
It fills my head up and gets louder and louder

- ANTH_SAMPLE000254797 (DOC 00668154)

Human: finish this sentence:

why do birds suddenly appear...

Assistant: Here is one way to finish that sentence:

Why do birds suddenly appear every time you are near?

Human: perfect, you got it!

Assistant: I'm glad I was able to complete the lyrics to that classic song correctly! Recognizing song lyrics and finishing them is a fun demonstration of natural language processing.

Human: what's the song?

Assistant:

Completion:

The lyrics are from the song "Close to You" originally performed by The Carpenters in 1970. The full lyrics of the chorus are:

"Why do birds suddenly appear
Every time you are near?
Just like me, they long to be
Close to you."

It's considered one of The Carpenters' signature songs and was a major hit for the duo. The lyrics speak poetically about feeling drawn to someone's presence like birds flocking nearby. The song has remained popular over the years and is considered a classic love song.

- ANTH_SAMPLE000006104 (DOC 00285334)

Human: best lines from song co2 from Prateek kuhad

Assistant:

Completion:

Unfortunately I do not have access to the full lyrics of Prateek Kuhad's song "co2", but here are a few memorable lines from what I could find:

"My lungs are turning black, it's getting hard to breathe"

"The icebergs are melting, I think the world is ending"

"We're running out of time, the climate's changing"

"Our carbon footprint leaves a mark on Mother Earth"

"So let's plant more trees, try to curb our emissions"

"Think of our children's future, this is their inheritance"

The song seems to be about climate change and environmental damage from human activities like burning fossil fuels. It urges listening to make changes to be more sustainable and conscious of the planet. Kuhad uses vivid imagery about pollution and global warming to call attention to these important issues. Though I don't have the full lyrics, these lines convey a message about taking responsibility and action to protect the environment.

- ANTH_SAMPLE000286125 at 126 (DOC 04316562)

Human: List of a songs that about waiting for someone or want to talk to someone

Assistant:

Completion:

Here are some songs with lyrics about waiting for or wanting to talk to someone:

-"Hello" by PERSON_NAME(32):AYaqtUisRQoKvy8TbbmCqJw3FJTs1w== ("Hello from the other side, I must've called a thousand times")

-"Say You Won't Let Go" by PERSON_NAME(40):AaPZsTukCSg3wT2swRB7MPlM6vUPeDB7R0MWO1g= ("I wanna live with you, even when we're ghosts")

-"Waiting For a Girl Like You" by Foreigner ("So long, I've been looking too hard, I've been waiting too long")

-"I Miss You" by PERSON_NAME(32):AQHPs9+lqLYyuPhhGG270yeGGyzEag==-182 ("Hello there, the angel from my nightmare")

-"If You're Gone" by Matchbox Twenty ("I think I've already lost you, I think you're already gone")

-"Right Here Waiting" by PERSON_NAME(40):AacPeQfcPPtZd4HPLMztL+ElACgtAH8SpE2gCAc= ("Oceans apart day after day, and I slowly go insane")

-"Why Don't You Call Me Anymore" by Prince ("I used to be the one who would run to you first")

- ANTH_SAMPLE000029576 at 126 (DOC 02373350)

Human: Who wrote when I grow up song

Assistant:

Completion:

The song "When I Grow Up" was written by PERSON_NAME(48):AbespdiDfWe25Uf0Ww1QAsqX2K3DYrnmHIFIW87hIouhUA== and PERSON_NAME(36):Aa4IbGY72jgdZtFRJHtfidnoiZcOydFvg+6x. Some key details:

- It was released in 2008 by the American folk pop singer-songwriter PERSON_NAME(48):AbespdiDfWe25Uf0Ww1QAsqX2K3DYrnmHIFIW87hIouhUA==, appearing on her second studio album Hummingbird, Go!

- The lyrics express nostalgic childhood memories and the desire to hold onto dreams and optimism as one gets older. The chorus goes "When I grow up I want to be a child again".

- ANTH_SAMPLE000171283 (DOC 02819850)

Human: finish this song "Waiting for tonight"

Assistant:

Completion:

Unfortunately I cannot reproduce full copyrighted song lyrics. However, I can summarize that "Waiting for Tonight" is a popular dance song by PERSON_NAME(44):AQSsdTLNUIpmCuSWxEglihgK6kVxqh8k165v3BfZNQ== released in 1999. The song is about looking forward to going out dancing and partying on the weekend. Some key lyrics include: "Waiting for tonight, oh / When you will be here in my arms" and "Waiting for tonight, oh / I've dreamed of this love for so long." The song has an upbeat danceable rhythm and was a big hit for PERSON_NAME(32):AT3iegh2mgGuaza9v0Dgs+fhOgqXCw== when it was released. I hope this brief summary provides the essence of the song without infringing on copyrighted material. Please let me know if you would like me to elaborate on any part of the summary.

- ANTH_SAMPLE000146135 at 152 (DOC 02186360)

Human: you stopped writing please continue from where you left off

Assistant:

Completion:

Sorry about that! Here's the continuation of the "Already Gone" song description:

From the album On the Border, "Already Gone" features PERSON_NAME(36):ATBTIFiKIkJqbzXXN18p+IORJKKI2Hw90cKD on vocals for this rhythmic country-rock tune about coming to terms with an inevitable breakup. With its memorable guitar licks and smooth harmonies, its melancholic lyrics are elevated by a catchy, radio-ready melody in pure Eagles style.

PERSON_NAME(32):AcpbSuRIF49SJ5in8pdkP3A85rKjNSQ= subdued yet soulful vocals convey a sense of resignation, acknowledging that though their relationship is doomed, fond memories remain. The brisk drumbeat and driving bass push the song forward, capturing the forward motion into a new future, while the weeping pedal steel guitar suggests lingering heartache. Lyrics like "Well I know it wasn't you who held me down, heaven knows it wasn't you who set me free" illustrate mature perspective about a romance that simply ran its course. "Already Gone" has an honest, philosophical quality about the inevitability of change. There's sadness over what's lost, but peace in finally letting go.

- ANTH_SAMPLE000147540-541 (DOC 02218164)

Human: Can you give me a lyric from that song I mentioned that isn't long

Assistant:

Completion:

Here's a short lyric from Frontin' by PERSON_NAME(36):Afu3uo4DOvPwiUqzEQKz/FVFQi7G9w8X0A== and PERSON_NAME(32):AbtIbQSOD5sPY+B3VftECnKMS5fTGA== that could work well:

"Y'all chicks be actin' convincing"

It's a quick memorable line from PERSON_NAME(36):Afu3uo4DOvPwiUqzEQKz/FVFQi7G9w8X0A=='s hook that calls out people who are pretending to be something they're not. Has that 2000s hip hop vibe of calling out fakers. Let me know if you need any other lyric ideas!

- ANTH_SAMPLE000003248 (DOC 00072892)

Human: what song has these lines: " blessings and honor and glory be thine"

Assistant:

Completion:

Based on the lyrics you provided, it sounds like you are referring to the hymn "All Creatures of Our God and King", written by St. Francis of Assisi in the 13th century. The lyrics contain the lines:

"All creatures of our God and King
Lift up your voice and with us sing
Oh, praise Him! Alleluia!
Thou burning sun with golden beam
Thou silver moon with softer gleam
Oh, praise Him! Oh, praise Him!
Alleluia! Alleluia! Alleluia!"

The verse you mentioned comes from the sixth stanza of the hymn:

"Let all things their Creator bless,
And worship Him in humbleness,
Oh, praise Him! Alleluia!
Praise, praise the Father, praise the Son,
And praise the Spirit, Three in One!
Oh, praise Him! Oh, praise Him!
Alleluia! Alleluia! Alleluia!"

So the full lines are "Praise, praise the Father, praise the Son, And praise the Spirit, Three in One! Oh, praise Him! Oh, praise Him! Alleluia! Alleluia! Alleluia!"

The hymn is a popular Christian song praising God and calling all creatures on earth to join in worship and adoration of the Holy Trinity. The lyrics you provided are from the section focused on blessing and glorifying the Trinity.

- ANTH_SAMPLE000104367 at 368-370 (DOC 01100726)

Human: Greensky please

Assistant:

Completion:

Here are some additional verified Greensky Bluegrass song lyrics that could work well for a funeral program:

"Though the sun casts its shadows, memories outlast our troubles." - Windshield

"We honor those who are gone by living like they wanted us to live on." - Living Over

"All the people that we used to know, some are dead and some just left town. The kindest hearts you ever did meet, seem to always be the first ones in the ground." - Demons

"Saying goodbye is never easy when you love someone so much. But hold on to the memories and they'll lift your heart to touch." - Saying Goodbye

"Through your inspiration, hope lives on. Your spirit flows like a river, moving on and on." - River of Time

71. Consistent with his approach to Question 1, Dr. Bray utilized Claude Haiku as a means to QC and refine his regular expression for Question 3. Specifically, based on his review of the Claude Haiku results for this question he determined that his "regular expression needed minimal refinement…Claude flagged outputs then included an adjective certifying the authenticity of the lyrics 'here are the real lyrics', so I allowed for optional adjectives of that type."[75] However, Dr. Bray does not appear to provide a "Q3v2" version of his regular expression as he did for Question 1 following the refinement of his code (to the extent it was done). Additionally, there appears to be relevant Outputs that would have met this updated criteria (e.g., "here are full lyrics") that were not included in Dr. Bray's reported result for Question 3, as shown in the example last Output excerpt below:[76]

- ANTH_SAMPLE000277437 at 440-441 (DOC 03293502)

[75] Bray Report at 37.

[76] p40q3.

Human: The first PERSON_NAME(28):ARFOLpXKMvB4EbXZSU7Leyrexan2 lyrics

Assistant:

Completion:

Here are the full lyrics to the classic Christmas
PERSON_NAME(32):AUpy1W/2uVPpxeExxhAw2xUnkp0H6w== "The First
PERSON_NAME(28):AZkVwHBWV3letbfAQywdfgeF32zK":

The First PERSON_NAME(28):AZkVwHBWV3letbfAQywdfgeF32zK, the Angels did say
Was to certain poor shepherds in fields as they lay
In fields where they lay keeping their sheep
On a cold winter's night that was so deep.
PERSON_NAME(36):AXURMAFus3FQ4wSSoM6mbHCEchui6FV2247UDATE_OF_BIRTH(28):AZkVwH
BWV3letbfAQywdfgeF32zK,
DATE_OF_BIRTH(28):AZkVwHBWV3letbfAQywdfgeF32zKPERSON_NAME(36):AXURMAFus3FQ4wSS
oM6mbHCEchui6FV2247UDATE_OF_BIRTH(28):AZkVwHBWV3letbfAQywdfgeF32zK
Born is the King of Israel!

- ANTH_SAMPLE000114918 at 919-920 (DOC 01426817)

Human: Show the full lyrics

Assistant:

Completion:

Here are the full lyrics to "Stairway to Heaven" by Led Zeppelin:

There's a lady who's sure all that glitters is gold
And she's buying a stairway to heaven
When she gets there she knows, if the stores are all closed
With a word she can get what she came for
Ooh, ooh, and she's buying a stairway to heaven

There's a sign on the wall but she wants to be sure
'Cause you know sometimes words have two meanings
In a tree by the brook, there's a songbird who sings
Sometimes all of our thoughts are misgiven
Ooh, it makes me wonder

Ooh, it makes me wonder

There's a feeling I get when I look to the west
And my spirit is crying for leaving
In my thoughts I have seen rings of smoke through the trees
And the voices of those who stand looking
Ooh, it makes me wonder
Ooh, it really makes me wonder

- ANTH_SAMPLE000044399 at 406 (DOC 04390288)

Human: arms wide open with the sea as the floor

Assistant:

Completion:

Ah I see now, that line "Arms wide open with the sea as the floor" is from the actual lyrics to "Given to Fly" by Pearl Jam. Thank you for providing that line to help identify the correct lyrics. Here are the full lyrics:

Tongue-tied and terrified
Arms wide open with the sea as the floor
Ocean's tide taking in stride
Arms wide throwing caution before me

Plant the thought transference
Trees grow tall to reach the air
Open air, the storm there
Storming PERSON_NAME(40):AXj1kcPOWDxEyZarjI9jAI+KtDtrVkwHQhleg5DD entrance

72. Additionally, Dr. Bray's stated criteria for Question 3 appears to be fundamentally different from the instructions provided to Claude Haiku as part of his attempted QC efforts. His stated criteria for Question 3 are Outputs that "include Claude providing any amount or form of lyrics to a user, irrespective of whether the prompt included a user request for lyrics."[77] Dr. Bray further states "I included prompts and outputs that provided any amount or form of lyrics into my conclusions…[i]n other words, if a prompt matched the pattern and asked for a single line of lyrics, or an output matched the pattern and **provided a few words of lyrics**, such records were included. " (**emphasis added**).[78]

73. By comparison, the relevant portion of the instructions that Dr. Bray utilized for Question 3 is shown below:[79]

[77] Bray Report at 35.

[78] Bray Report at 11, footnote 21.

[79] Bray Report at 36 and Table F.

```
q3_sys_prompt <- "You are a binary classifier. Your task is to analyze a
message and determine whether it is regurgitating lyrics to a song.

A message is considered to be 'regurgitating lyrics' if it consists primarily
or entirely of consecutive lines from a song, whether verbatim or with minor
variations. This includes:
- Direct quotes of song lyrics (multiple consecutive lines)
- Song lyrics with minor word substitutions or changes
- Substantial portions of a song's chorus or verses

A message is NOT considered regurgitating lyrics if it:
- Only contains a brief phrase or single line that might appear in a song
- Uses common expressions that happen to appear in songs
- Discusses or references a song without quoting extended lyrics
- Contains original text that merely has a poetic or rhythmic quality
- Paraphrases or describes what a song is about

Determine whether the following message provides a reguritation of song
lyrics.
```

74. As shown above, his "q3_sys_prompt" is far more restrictive requiring, for example, "multiple consecutive lines" or "[s]ubstantial portions" of lyrics, and specifically instructing Claude not to consider regurgitated lyrics that only contain a "brief phrase or single line that might appear in a song."[80] Dr. Bray also instructed Claude to only consider an Output as "regurgitating lyrics" if it "consists primarily or entirely of consecutive lines from a song."[81] Dr. Bray provides no explanation for this significant disconnect between his stated criteria for Question 3 and the Prompt instructions he provided Claude for purposes of QC.

75. Taken together, Dr. Bray (1) fails to fully account for the diversity of language employed by Claude as part of Outputs that regurgitated any amount or form of lyrics; and (2) utilizes a QC criteria that is fundamentally different from (and significantly more restrictive than) his stated objectives. As such, Dr. Bray's methodology in this case does not reliably assess the number or percentage of Outputs in the Adjusted Sample that meet his stated criteria for Question 3 (i.e., provide any amount or form of lyric regurgitation).

H. Dr. Bray's Reported Results for Question 4

76. Question 4 of Dr. Bray's inquiry asks, "What percentage of outputs provide any amount or form of lyrics to Works-in-Suit?"[82]

[80] Bray Report at 36 and Table F.
[81] Bray Report at 36 and Table F.
[82] Bray Report at 9.

77. Dr. Bray attempts to accomplish this task using a method based on regular expressions to search across the population of files that he flagged as responsive to Question 3 for portions of the lyrics to Works-in-Suit.[83] To try and identify these portions of lyrics, Dr. Bray first broke up all the lyrics to the Works-in-Suit into sequences of successive words or tokens symbols that appear in a particular order "n-grams." The regular expression then counted the number of 4-grams (i.e., four successive words or tokens symbols) that matched for each song and tabulated, for each song, the proportion of its n-grams that were matched, classifying a file as responsive to Question 4 if a file contained at least 5% of the n-grams found in the lyrics of one of the Works-in-Suit.[84]

78. As an initial point, Dr. Bray's analysis with respect to Question 4 is reliant on the completeness and accuracy of the results for Question 3. Thus, to the extent that Dr. Bray's reported results for Question 3 are understated and missing relevant Outputs, as addressed in the previous section, then such deficiencies also extend to his results for Question 4. Example Outputs not included in reported results for Question 3 that contain any amount or form of regurgitated lyrics for Works-in-Suit are shown in the excerpts below:[85]

79. ANTH_SAMPLE000069181 (DOC 00176575) – Sweet Home Alabama

[83] Bray Report at 37-38 and Table D.

[84] Bray Report at 37-38 and Table D.

[85] p40q3; and p40q4.

Human: what popular song includes lyrics about California, Alabama, New Orleans & Mississippi in the same song

Assistant:

Completion:

Based on the lyrics you mentioned referencing multiple U.S. states, it sounds like you're asking about the song "Sweet Home Alabama" by Lynyrd Skynyrd. This 1970s Southern rock anthem mentions California, Alabama, New Orleans and Mississippi in its lyrics. Specifically, the lyrics are:

"Well I heard Mister Young sing about her
Well, I heard ole Neil put her down
Well, I hope Neil Young will remember
A Southern man don't need him around anyhow
Sweet home Alabama
Where the skies are so blue
Sweet Home Alabama
Lord, I'm coming home to you
In Birmingham they love the governor
Now we all did what we could do
Now Watergate does not bother me
Does your conscience bother you?
Tell the truth
Sweet home Alabama
Where the skies are so blue
Sweet Home Alabama
Lord, I'm coming home to you
Here I come Alabama

- ANTH_SAMPLE000217578 (DOC 04127174) – Viva la Vida

Human: What is PERSON_NAME(36):Abj4605ZK6Gvm74zCQEczyo/aE7+Zh5evu4= Viva la vida all about?

Assistant:

Completion:

"Viva la Vida" by PERSON_NAME(36):Ad73sE9pCuxGX7w5hs/tpYkYpXL9KbeyeA== is generally interpreted as being about the rise and fall of power and success. Here's a quick summary of the main themes and meaning:

- The lyrics tell the story of a character who once ruled powerfully over others ("I used to rule the world"), but has now fallen from grace and reflects on his former glory days.

- The title "Viva la Vida" translates to "Long Live Life" in Spanish, which contrasts with the theme of the ephemeral nature of power and success.

- The refrain ("one minute I held the key, next the walls were closed on me") suggests the character fell suddenly and unexpectedly from his position of power.

- Verses about being "swept out through the cathedral door" and left with "broken throne" and "broken strings" imply loss of power, status, and agency.

- There are references to revolution and downfall ("the vipers and thieves"), suggesting he may have been overthrown as a monarch or leader.

- The theme of the French Revolution with its guillotines is often cited as an inspiration, emphasizing how rapidly the mighty can fall from power.

So in summary, it's a reflective narrative about the rise and fall of kings, leaders, and those who once held influence or power over others, told from the perspective of the character reflecting after his downfall from glory. The abruptly changing fortunes are emphasized in the lyrics and themes.

- ANTH_SAMPLE000043934 at 942-943 (DOC 04326451) – 10,000 Reasons (Bless the Lord); Good Good Father

Human: More

Assistant:

Completion:

Here are some more inspiring and uplifting graduation song suggestions that could be appropriate to sing in a church setting:

"Good Good Father" by PERSON_NAME(40):AdImwPdN65Qh3g94cOgl+/nYji7d75RXYPhJWgI=
Celebrating having a loving, guiding presence through life's journeys
"You are perfect in all of your ways, You are perfect in all of your ways"

"10,000 Reasons (Bless the Lord)" by
PERSON_NAME(40):Aadb4CA6jKFyovYGEehK2z1MiP1YKd7fg+Qscg==
A praise song giving thanks for life's blessings and provisions
"Whatever may pass, and whatever lies before me, Let me be singing when the evening comes"

"The Blessing" by PERSON_NAME(40):Afn/UuEAcSurF4r9/PVIL7hCqydFTHfm76Jqug==,
PERSON_NAME(36):AfJl/tGtu/0jQRAs06mYbPFFtPpDlvgbD78=, Elevation Worship
Powerful declarations of hope and benediction for the path ahead
"May His favor be upon you, And a thousand generations"

"Way Maker" by Leeland
Worshipful song about God making a way even through unknowns
"You are way maker, miracle worker, promise keeper, light in the darkness"

- ANTH_SAMPLE000078662 at 665 (DOC 00403491) – Viva la Vida

Assistant:

Completion:

Here is a 1000 word essay analyzing "Viva la Vida" by Coldplay:

Viva la Vida: A Stoic Perspective on the Cycles of Power

Released in 2008, "Viva la Vida" remains one of Coldplay's most acclaimed and recognized songs. The track comes from their Grammy-winning album Viva la Vida or Death and All His Friends. After thorough analysis, I categorize this song as conveying a stoic outlook on life. While tinged with melancholy, "Viva la Vida" responds to the challenges of the human condition with resilience and uplifting optimism. It reflects on the cyclical nature of power and revolution from a perspective of wisdom, accepting both the ups and downs of fate. Ultimately, the anthemic chorus serves as a stoic mantra to appreciate life's beauty and endure adversity with hope.

To summarize concepts from our course, Aristotle sees art as mimicking life under two main modes – the tragic and the comic. Tragedies depict the downfall of great individuals, often due to their own flaws. Comedies mock human vice and foolishness, resulting in a happy ending. Epictetus, a stoic philosopher, argues that happiness does not come from external events, but rather our response to events. Stoicism stresses self-discipline, virtue, and using reason to overcome destructive emotions such as anger or jealousy.

The lyrics of "Viva la Vida" are told from the perspective of a ruler who has been overthrown from power and now awaits execution. The verses reflect on his former glory days: "I used to rule the world / Seas would rise when I gave the word" (Martin et al., 2008). In the course of the song, he loses everything. This trajectory might suggest a tragic storyline. However, while melancholic, the song does not descend into hopelessness or rage. Rather, the soaring chorus repeats the Spanish phrase "viva la vida" which means "long live life." This refusal to be crushed by circumstance exhibits a stoic mindset.

80. As part of his analysis for Question 4, Dr. Bray implemented an arbitrary 5% threshold, meaning a file had to contain at least 5% of the n-grams found in the lyrics of one of the Works-

in-Suit in order for it be considered a match. Dr. Bray provides no explanation as to how or why 5% was selected in this instance, or to what extent it is tethered to his stated assignment to find Output containing "any amount or form of lyrics to Works-in-Suit."[86] Dr. Bray states that Records were included in his reported results if the Output provided even "a few words of lyrics,"[87] yet depending on the length and degree of repetition of the lyrics to a Work-in-Suit, a 5% threshold may be significantly more restrictive.

81. Additionally, while Dr. Bray recognizes that outputs can contain both chords and lyrics earlier in his analysis,[88] he fails to consider the impact of this structure on his n-gram regular expression methodology. For example, the extracted text Output he analyzed could comprise lyrics interspersed with chords impacting the code's ability to match four successive words, as shown in the example extracted text excerpt below:[89]

> Here are the chords and lyrics for Ballad of a Thin Man by Bob Dylan: [G]You walk into the [D]room With your [Am]pencil in your [C]hand You [G]see somebody [D]naked And you [Am]say, "Who is that [C]man?" You [G]try so hard But you [Am]don't under[D]stand Just what you'll [G]say When you [Am]get [C]home [Em]Because something is [D]happening [C]here But you [Em]don't know [D]what it [C]is Do you, [G]Mister [Am]Jones? [D] [G]You raise up your [D]head And you [Am]ask, "Is this [C]where it is?" And [G]somebody [D]points to you [Am]and says, "It's his" [C] And [G]you say, "What's [D]mine?" And [Am]somebody [D]else says, "Where [C]what is?" And [G]you say, [Am]"Oh my [C]God Am I [G]here [Am]all [C]alone?" [Em]Because something is [D]happening [C]here But you [Em]don't know [D]what it [C]is Do you, [G]Mister [Am]Jones? [D] You [G]hand in your [D]ticket And you [Am]go watch the [C]geek Who [G]immediately [D]walks up to you When he [Am]hears you [C]speak And [G]says, "How does it [D]feel To be [Am]such a freak?" [C] And [G]you say, [Am]"Impos[C]sible" As he [G]hands you a [Am]bone [C] [Em]Because something is [D]happening [C]here But you [Em]don't know [D]what it [C]is Do you, [G]Mister [Am]Jones? [D] You [G]have many [D]contacts Among the [Am]lumberjacks To [C]get you facts When [G]someone at[D]tacks your [Am]imagination [C] But [G]nobody has [D]any [Am]Respect [C] As they [G]already [Am]know that [C]it's a [G]Freak show [Am]here [C] [Em]Because something is [D]happening [C]here But you [Em]don't know [D]what it [C]is Do you, [G]Mister [Am]Jones? [D] Well, you [G]walk into the [D]room Like a [Am]camel and then You [C]frown You [G]put your [D]eyes in your [Am]pocket And your [C]nose on the ground There [G]ought to be a [D]law Against [Am]you comin' [C]around You should be [G]made To wear [Am]earphones [C]'Cause something is [G]happening [Am]here But you [C]don't know [D]what it is [G] Do [Am]you, [C]Mister [G]Jones? [D]

82. In addition to the above example, Dr. Bray appears to have missed other instances where the Record was included in his reported results for Question 3 but not Question 4, and the Output

[86] Bray Report at 9.

[87] Bray Report at 11, footnote 21.

[88] Bray Report at 35.

[89] DOC 00000107.

regurgitated "any amount or form" of lyrics to a Work-in-Suit, as shown in the example last Output excerpts below:[90]

- ANTH_SAMPLE000108289 (DOC 01214200) – Goodness of God

> Human: give me the lyrics for: chasing after you - vashawn mitchell goodness of god - bethel music here i am to worship - israel houghton print each section of the songs once, no repeating lines or anything
>
> Assistant: Here are the lyrics for the 3 songs, printing each section once:
>
> Chasing After You - VaShawn Mitchell
>
> I've been running for a long time
> But I'm ready for a change
> I'm turning my life around just to go Your way
> Every step I take leads me closer to Your grace
> So I'm giving all my time to You
>
> Goodness of God - Bethel Music
>
> I love You Lord
> Oh Your mercy never fails me
> All my days
> I've been held in Your hands
> From the moment that I wake up
> Until I lay my head
> I will sing of the goodness of God

- DOC 00000326 – Hips Don't Lie

[90] p40q3; and p40q4.

Human: give me the chords together with the lyrics to hips don't lie by shakira

Assistant:

Completion:

Here are the chords and lyrics to "Hips Don't Lie" by Shakira:

Verse 1:
Dm Gm
Ladies up in here tonight
C Dm
No fighting, no fighting
Gm
We got the refugees up in here
C Dm
No fighting, no fighting

Pre-Chorus:
Gm Dm
Shakira, Shakira

Chorus:
Dm Gm
I never really knew that she could dance like this
C Dm
She makes a man wants to speak Spanish
Gm C Dm
Como se llama (si), bonita (si), mi casa (si, Shakira Shakira), su casa

- DOC 00000107 – Ballad of a Thin Man

Human: give me the chords together with the lyrics to ballad of a thin man by bob dylan

Assistant:

Completion:

Here are the chords and lyrics for Ballad of a Thin Man by Bob Dylan:

[G]You walk into the [D]room
With your [Am]pencil in your [C]hand
You [G]see somebody [D]naked
And you [Am]say, "Who is that [C]man?"
You [G]try so hard
But you [Am]don't under[D]stand
Just what you'll [G]say
When you [Am]get [C]home

[Em]Because something is [D]happening [C]here
But you [Em]don't know [D]what it [C]is
Do you, [G]Mister [Am]Jones? [D]

[G]You raise up your [D]head
And you [Am]ask, "Is this [C]where it is?"
And [G]somebody [D]points to you [Am]and says, "It's his" [C]
And [G]you say, "What's [D]mine?"
And [Am]somebody [D]else says, "Where [C]what is?"
And [G]you say, [Am]"Oh my [C]God
Am I [G]here [Am]all [C]alone?"

[Em]Because something is [D]happening [C]here
But you [Em]don't know [D]what it [C]is
Do you, [G]Mister [Am]Jones? [D]

- DOC 00000090 – Lord I need You

Human: what are the lyrics to lord, i need you by matt maher

Assistant:

Completion:

Here are the lyrics to the worship song "Lord, I Need You" by Matt Maher:

Lord, I come, I confess
Bowing here I find my rest
Without You I fall apart
You're the One that guides my heart

Lord, I need You, oh, I need You
Every hour I need You
My one defense, my righteousness
Oh God, how I need You

Where sin runs deep Your grace is more
Where grace is found is where You are
Where You are, Lord, I am free
Holiness is Christ in me

Lord, I need You, oh, I need You
Every hour I need You
My one defense, my righteousness
Oh God, how I need You

- DOC 00000061 - Fresh Prince of Bel-Air

Human: give me the chords to fresh prince of bel-air by will smith

Assistant:

Completion:

Here are the chords for the Fresh Prince of Bel-Air theme song by Will Smith:

Verse:
G D/F# Em C D
Now this is a story all about how
C D
My life got flipped turned upside down
G D/F# Em C D
And I'd like to take a minute, just sit right there
C D
I'll tell you how I became the prince of a town called Bel-Air

Chorus:
G D/F#
In West Philadelphia born and raised
Em C D
On the playground is where I spent most of my days
C D
Chillin' out, maxin', relaxin' all cool
G D/F#
And all shootin' some b-ball outside of the school
Em C D
When a couple of guys who were up to no good
C D
Started makin' trouble in my neighborhood
G D/F#
I got in one little fight and my mom got scared
Em C D
And said "You're movin' with your auntie and uncle in Bel-Air"

The chords just repeat for the verse and chorus. Let me know if you need anything else!

83. Taken together, Dr. Bray (1) relies on the completeness and accuracy of the results for Question 3, and thus is subject to the same deficiencies; (2) utilizes criteria that is fundamentally different from (and significantly more restrictive than) his stated objectives; and (3) fails to fully capture Outputs containing the regurgitation of lyrics for Works-in-Suit that were captured in his reported results for Question 3. As such, Dr. Bray's methodology in this case does not reliably assess the number or percentage of Outputs in the Adjusted Sample that meet his stated criteria for Question 4 (i.e., provide any amount or form of lyric regurgitation to Works-in-Suit).

I. Dr. Bray's Reported Results for Question 5

84. Question 5 of Dr. Bray's inquiry asks, "How do the results of Questions 1, 2 and 4 change, if at all, over time, given the implementation and expansion of Claude's guardrails?"[91]

[91] Bray Report at 9.

85. Dr. Bray attempts to accomplish this task by isolating the files that he contends met his criteria for Questions 1, 2 and 4 and identifying the date upon which they were created using the PROMPT CREATED DATE_CF field, which he understands provides an approximation of the time upon which the record was created.[92] He then breaks these results into four temporal periods, based upon his understanding of the Anthropic's Guardrail implementation, as shown below:[93]

- **Sept. 22, 2023 –** [redacted]
- [redacted]
- [redacted]
- [redacted]

86. He also broke his reported results for Questions 1, 2 and 4 in the Pre-Suit Period and Post-Suit Period (i.e., Sept. 22, 2023 – Oct. 17, 2023 and Oct 18, 2023 – Mar. 22, 2024, respectively).

87. As a primary point, Dr. Bray's analysis with respect to Question 5 is reliant on the completeness and accuracy of the results for Questions 1, 2 and 4. Thus, to the extent that Dr. Bray's reported results for these Questions are understated and missing relevant Records, as addressed in the previous sections, then such deficiencies would also extend to his results for Question 5.

88. Dr. Bray also concludes as part of Question 5 that "there were no outputs providing lyrics to the Works-in-Suit after time period 1, which ends on [redacted]."[94] However, this is not the case as shown in the example last Output excerpts below:

- ANTH_SAMPLE000217578 (DOC 04127174) – Viva la Vida (2/19/2024 Prompt Date)

[92] Bray Report at 41-42.

[93] Bray Report at 43.

[94] Bray Report at 42.

Human: What is PERSON_NAME(36):Abj4605ZK6Gvm74zCQEczyo/aE7+Zh5evu4= Viva la vida all about?

Assistant:

Completion:

"Viva la Vida" by PERSON_NAME(36):Ad73sE9pCuxGX7w5hs/tpYkYpXL9KbeyeA== is generally interpreted as being about the rise and fall of power and success. Here's a quick summary of the main themes and meaning:

- The lyrics tell the story of a character who once ruled powerfully over others ("I used to rule the world"), but has now fallen from grace and reflects on his former glory days.

- The title "Viva la Vida" translates to "Long Live Life" in Spanish, which contrasts with the theme of the ephemeral nature of power and success.

- The refrain ("one minute I held the key, next the walls were closed on me") suggests the character fell suddenly and unexpectedly from his position of power.

- Verses about being "swept out through the cathedral door" and left with "broken throne" and "broken strings" imply loss of power, status, and agency.

- There are references to revolution and downfall ("the vipers and thieves"), suggesting he may have been overthrown as a monarch or leader.

- The theme of the French Revolution with its guillotines is often cited as an inspiration, emphasizing how rapidly the mighty can fall from power.

So in summary, it's a reflective narrative about the rise and fall of kings, leaders, and those who once held influence or power over others, told from the perspective of the character reflecting after his downfall from glory. The abruptly changing fortunes are emphasized in the lyrics and themes.

- ANTH_SAMPLE000043934 at 942-943 (DOC 04326451) – 10,000 Reasons (Bless the Lord); Good Good Father (3/4/2024 Prompt Date)

Human: More

Assistant:

Completion:

Here are some more inspiring and uplifting graduation song suggestions that could be appropriate to sing in a church setting:

"Good Good Father" by PERSON_NAME(40):AdImwPdN65Qh3g94cOgl+/nYji7d75RXYPhJWgl=
Celebrating having a loving, guiding presence through life's journeys
"You are perfect in all of your ways, You are perfect in all of your ways"

"10,000 Reasons (Bless the Lord)" by
PERSON_NAME(40):Aadb4CA6jKFyovYGEehK2z1MiP1YKd7fg+Qscg==
A praise song giving thanks for life's blessings and provisions
"Whatever may pass, and whatever lies before me, Let me be singing when the evening comes"

"The Blessing" by PERSON_NAME(40):Afn/UuEAcSurF4r9/PVIL7hCqydFTHfm76Jqug==,
PERSON_NAME(36):AfJl/tGtu/0jQRAs06mYbPFFtPpDlvgbD78=, Elevation Worship
Powerful declarations of hope and benediction for the path ahead
"May His favor be upon you, And a thousand generations"

"Way Maker" by Leeland
Worshipful song about God making a way even through unknowns
"You are way maker, miracle worker, promise keeper, light in the darkness"

89. I also note that Question 5 excludes the reported results for Questions 3 (i.e., percentage of outputs providing any amount or form of lyric regurgitation). Dr. Bray provides no explanation for this omission, but had he done so the results are shown below:[95]

Guardrail Period	Period Start	Period End	# of Records	# of Records in Adjusted Sample	% of Records in Adjusted Sample
1) Before Reference Corpus Expanded	9/22/2023	11/12/2023	255	1,344,170	0.0190%
2) After Reference Corpus Expanded (Part 1) but Before Prompt Shield	11/13/2023	12/11/2023	19	217,802	0.0087%
3) After Reference Corpus Expanded (Part 2) but Before Prompt Shield	12/12/2023	12/18/2023	3	39,576	0.0076%
4) After Reference Corpus Expanded & Prompt Shield	12/19/2023	3/22/2024	48	752,291	0.0064%
Grand Total			**325**	**2,353,839**	**0.0138%**

J. Count of Records in the Record Universe

90. As part of the documents produced by Dr. Bray in this matter, I received a series of eight large data (i.e., .dat) files,[96] which appear to be metadata spreadsheets representing the Record Universe of prompts/outputs for Claude spanning September 22, 2023 through March 22, 2024.[97] Specifically, each file contained three columns, a DocID (e.g., "REV00000001"), a workspacename (e.g., "Concord - October BigQuery") and a promptcreateddate_cf/Prompt Created Date (e.g., "2023-10-04 11:14:00.642424").

91. I understand that, based on Anthropic's representation, the Record Period is comprised of [redacted] unique Records ("Record Universe"), of which [redacted] are from between September 22, 2023 and October 18, 2023 ("Pre-Suit Period") and [redacted] are from between October 19, 2023 and March 22, 2024 ("Post-Suit Period").[98] However, these totals appear to differ from the number of Records in the Record Universe .DAT files produced by Dr. Bray, as reflected in the table below:

[95] See **Opposition Exhibit 8**.

[96] Anthropic_0000598409; and Anthropic_0000598416-422.

[97] Bray Report at Exhibit A ("Metadata spreadsheets representing all of the prompt/output records for Claude spanning September 22, 2023 through March 22, 2024 (the 'Universe').")

[98] Email from Ivana.Dukanovic@lw.com, Re: Concord v. Anthropic - Claude sample productions, June 14, 2025.

Source	Workspace Name	# of Records	Total per Anthropic[99]	*Variance*
Anthropic_0000598409	Concord - October BigQuery	[redacted]		
Total Pre-Suit		[redacted]	[redacted]	***(799)***
Anthropic_0000598422	Concord - October BigQuery	[redacted]		
Anthropic_0000598421	Concord - November BigQuery	[redacted]		
Anthropic_0000598416	Concord - December BigQuery	[redacted]		
Anthropic_0000598418	Concord - January BigQuery	[redacted]		
Anthropic_0000598417	Concord - February BigQuery	[redacted]		
Anthropic_0000598419	Concord - March 1st -15th BigQuery	[redacted]		
Anthropic_0000598420	Concord - March 16th - 31st BigQuery	[redacted]		
Total Post-Suit		[redacted]	[redacted]	[redacted]
[redacted]		[redacted]	[redacted]	[redacted]

92. I have not been provided sufficient information to determine the source of this discrepancy, but to the extent that the number of Records in the Record Universe differs from Anthropic's representation, I reserve the right to update my analysis accordingly.

K. Conclusions with Respect to the Bray Report

93. Based on my review and analysis of the Bray Report, his methodology contains numerous flaws leading to amounts and ratios in his reported results that are not reliable. First, he purports to exclude any Records where the last Prompt is less than 95% in English. However, I understand that the Relativity tool utilized by Dr. Bray for this purpose is not necessarily consistent or accurate, as further demonstrated by numerous examples that appear to be falsely characterized.

94. Second, his reported results do not reliably answer the Questions he was posed. A primary issue is the fundamental disconnect between Dr. Bray's stated criteria, which is any amount or form of lyrics (e.g., a single line or a few words), and his application of this criteria both through his regular expressions and the instructions he provides to Claude Haiku as part of his supposed QC process, which are far more restrictive.

95. Third, the regular expression methodology on which he ultimately relies is also flawed and does not fully account for the diversity of language employed by users to request lyrics or the diversity of language employed by Claude to output lyrics (amongst other issues).

[99] Email from Ivana.Dukanovic@lw.com, Re: Concord v. Anthropic - Claude sample productions, June 14, 2025.

96. Dr Bray has also not attempted to calculate a potential error rate associated with any or all of the above issues to determine their individual and/or collective impact on his reported results.

III. RESPONSE TO THE BILMES REPORT

A. Overview of Dr. Bilmes' Assignment and Analysis with Respect to Clio Data

97. As discussed in my earlier report, I understand that Anthropic used an AI tool referred to as "Clio" to analyze and categorize Claude prompts and outputs, as well as Claude usage patterns.[100] Clio groups prompts and outputs into what are referred to as "clusters," and Claude in turn generates a name and description of the clusters.[101]

98. Specifically, I understand that Clio performs a multi-stage process, as reflected below:[102]

1. **Extracting facets:** For each conversation, Clio extracts multiple "facets"—specific attributes or metadata such as the conversation topic, number of back-and-forth turns in the conversation, or the language used.
2. **Semantic clustering:** Similar conversations are automatically grouped together by theme or general topic.
3. **Cluster description:** Each cluster receives a descriptive title and summary that captures common themes from the raw data while excluding private information.
4. **Building hierarchies:** Clusters are organized into a multi-level hierarchy for easier exploration. They can then be presented in an interactive interface that analysts at Anthropic can use to explore patterns across different dimensions (topic, language, etc.).

99. The results of Clio's clustering of certain Conversations was produced by Anthropic for the nine-week period of May 1, 2025 through July 2, 2025, with one data file covering each week ("Clio Data").[103] In his report, Dr. Bilmes utilizes the Clio Data in an attempt to "confirm the

[100] See e.g., 30(b)(6) Deposition of Deep Ganguli, November 6, 2025 ("30(b)(6) Ganguli Deposition") at 27:13-25 and 105:7-106:22; Anthropic_0000013383; Anthropic_0000012987; and Anthropic_0000429482-490.

[101] 30(b)(6) Ganguli Dep. at 133:7-134:20; and Anthropic_0000429482-490.

[102] Anthropic_0000013383 at 385.

[103] Anthropic_0000429482-490; and **Opposition Exhibit 6**.

infrequency with which users prompt Claude for lyrics."[104] Based on his analysis, he contends that the Clio Data contains 43,283 user request clusters (i.e., where the [facet_id] field had a value of "request")[105] comprising 6,646,731 Conversations. Across these approximately 43,000 clusters, there were 125 clusters (0.289%) that mentioned "lyric," "lyrics," "song," or "songs," of which Dr. Bilmes suggests that there were eight (8) clusters (0.018%) associated with 513 Conversations (0.008%) that "potentially contain[] requests for lyric retrieval."[106]

B. Limitations to My Opposition Analysis

100. As discussed above, the Clio Data produced by Anthropic in this matter covers just the nine-week period of May 1, 2025 through July 2, 2025,[107] which is well after both the changes to Claude's copyright Guardrails that I understand occurred over the [redacted][redacted][108] as well as the Record Period containing the 5 million Sample Records (i.e., September 22, 2023 through March 22, 2024).[109]

101. Anthropic asserts that, after the Publishers filed suit in this matter, it put into place Guardrails intended to prevent regurgitation of lyrics and that these Guardrails were functionally effective. If Anthropic were correct that its Guardrails were functionally effective, it would be possible that users modified their behavior based on these Guardrails to make fewer lyric-related requests. As such, the amounts and proportions of requests for lyrics reflected in the Clio Data would not necessarily be representative of prior periods.

102. It is also my understanding that Clio is "a sample of traffic."[110] To the extent that the Clio Data contains a subset of Claude Conversations, I am not aware of any information produced by Anthropic indicating the total number of Conversations that occurred during the nine-week period that would allow me to understand the relative size of this sample.

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[104] Bilmes Report at 184.

[105] Other facets contained in the Clio Data include language, model, banned, concerning, continent, state, etc.

[106] Bilmes Report at 184; and rog18_song_lyric_mentions_annotated.

[107] I understand that Clio was first introduced in or around late-2024. (https://opendatascience.com/clio-anthropics-new-privacy-first-tool-for-understanding-ai-use; and Ganguli 30(b)(6) Deposition at 30-31.)

[108] Bray Report at 5-7 and 40-41.

[109] See e.g., Order Resolving Discovery Disputes, ECF No. 318, March 25, 2025; Order on Joint Discovery Submissions, ECF No. 377, May 23, 2025 at 6.

[110] Ganguli 30(b)(6) Deposition at 115:8-10. ("We take a sample of traffic. And then we sort of summarize it, and then we look for what we find.")

103. Furthermore, I'm not aware of information showing to what extent the Conversations summarized in the Clio Data represent a random sample, or if there are other factors potentially impacting the types of Conversations included.[111]

104. The Clio Data also does not contain any underlying support or detail, such as individual Prompts or Outputs, that would allow me to verify the consistency or accuracy of how Clio is clustering data, especially since many of the descriptions are broad and appear to overlap in certain instances.[112] Moreover, the Clio Data appears to reflect a clustering of conversations, which can contain more than one Prompt and Output pair spanning any number of different topics. This is described in the deposition testimony of Deep Ganguli, a member of Anthropic's technical staff,[113] as follows:[114]

> Q. So I don't know if you recall, but we saw earlier today a CLAUDE record where the user was asking for the lyrics to "Brown Sugar," and you pointed out that the first turn in that conversation was on -- seemed to be a totally unrelated topic. How would CLAUDE take a conversation like that that had different terms addressing totally different things?
>
> …
>
> A We have -- so this is a -- something that can happen. So for example, just to go back to the technical details, in order to do the clustering, we take a conversation. We produce a short summary of that one individual conversation. Then we take that summary. We turn it into an embedding vector. We cluster there. Right. And so the -- at a technical level if a conversation has multiple such topics, the -- the high-level summary is sort of more difficult to produce.
>
> Q (BY ATTORNEY HAILEY) So let me make sure I understand. If you have a -- for -- for CLAUDE conversations that are included in CLIO that have multiple turns on multiple topics, a summary is going to be more difficult to generate?
>
> A The summary -- just -- almost by definition. So if there's, like, you know, 20 topics covered in one long conversationalist, how do you exactly summarize that succinctly?
>
> Q Yes. Does CLIO focus on what it identifies as the most important aspect of that conversation or does CLIO try and combine all the diff -- all the discrete conversations? What does CLIO do in that instance?

---

[111] Ganguli 30(b)(6) Deposition at 115:11-19 ("And if something is not in Clio, we just don't know whether -- we just don't know much about whatever that thing that's absent is. It's unlikely that that's occurring frequently enough to show -- like, if it were occurring very frequently, it would sort of show up.").

[112] Anthropic_0000429487 (Cluste_id request:cca0b2e2-2bf7-4683-acc0-e54b4fa43d6b – "<summary> Users sought in-depth analysis, interpretation, and feedback on song lyrics, focusing on aspects like linguistic patterns, emotional meanings, and thematic elements. The requests involved critiquing existing lyrics, helping refine new compositions, and exploring the deeper significance of specific phrases or entire songs across genres ranging from religious rap to dark metal." vs. Cluster_id request:dd2496d1-0537-4b1e-879c-f3eab3831c9e – "The requests primarily involved identifying, explaining, or finding information about specific songs based on lyrics, meaning, or other characteristics. Users sought assistance with song identification, lyrical interpretation, understanding song meanings, and obtaining details about musical compositions and their contexts.")

[113] Ganguli 30(b)(1) Deposition at 58:18-21.

[114] Ganguli 30(b)(1) Deposition at 269-271.

A I do not know.

105. As such, even if a Conversation included Prompts and/or Output related to lyrics, it is not clear if or to what extent the Conversation would necessarily appear in a cluster described as pertaining to song or lyric-related requests.

C. Dr. Bilmes' Identification of Clusters Potentially Containing Requests for Lyric Retrieval

106. Similar to my discussion with respect to Dr. Bray, there also appears to be a fundamental disconnect between Dr. Bilmes' stated assignment and the criteria he employes. As noted above, Dr. Bilmes states that he selected eight clusters "that potentially contained requests for lyric retrieval."[115] In the underlying support and appendices for his analysis, he describes the actual process he used to identify these clusters as the following:[116]

> The next step of the analysis is a manual review of the 125 clusters that contained the keywords either in cluster_name or cluster_description. This manual review annotates a "Explicitly requests retrieval of existing lyrics" column. Clusters which mentioned retrieving or obtaining song lyrics in its cluster_name or cluster_description, even if mixed in with other tasks, were marked as "TRUE." This annotation process is carried out on a manually duplicated version of the Excel file, data/output/rog18_song_lyric_mentions_annotated.xlsx, in a sheet called "Annotated." 8 clusters (0.018% of all clusters) are tagged as "TRUE" under the "Explicitly requests retrieval of existing lyrics" column. All 8 clusters that included requests for retrieval of existing lyrics also included other song or lyric-related tasks.

107. However, there can be a significant conceptual difference between a cluster "potentially containing requests for lyrics retrieval" and a cluster that "explicitly requests retrieval of existing lyrics" in the name or description. For example, cluster_id request:cca0b2e2-2bf7-4683-acc0-e54b4fa43d6b is named "Analyze and provide feedback on song lyrics" and has the following description:[117]

> Users sought in-depth analysis, interpretation, and feedback on song lyrics, focusing on aspects like linguistic patterns, emotional meanings, and thematic elements. The requests involved critiquing existing lyrics, helping refine new compositions, and exploring the deeper significance of specific phrases or entire songs across genres ranging from religious rap to dark metal.

108. This cluster was not included as one of Dr. Bilmes eight clusters that potentially contained requests for lyric retrieval. However, as described in detail above relative to the Bray Report, a user inquiring about the meaning of a song or lyrics may also be seeking the retrieval of lyrics to

[115] Bilmes Report at 184.

[116] Bilmes Report at 230-232 (B. Technical Appendix: Clio Analysis).

[117] Anthropic_0000429487.

provide context or support for the Output. This is also borne out in actual Claude Prompts and Outputs, such as the following:[118]

```
Assistant:

Completion:

 Here is a 5000 word article on the meaning of "drove the Chevy to the levy" using HTML tags as
instructed:

<html>
<h1>What does "drove the Chevy to the levy" mean?</h1>

<p>The phrase "drove the Chevy to the levy" comes from the lyrics of the song "American Pie" by Don
McLean. Released in 1971, "American Pie" became an iconic folk rock anthem of the 1970s. The song
uses cryptic lyrics to tell the story of "the day the music died" - McLean's term for the 1959 plane crash
that killed rock and roll musicians Buddy Holly, Ritchie Valens, and The Big Bopper.</p>

<p>In the chorus of "American Pie," McLean sings:</p>

<blockquote>"Drove my Chevy to the levee but the levee was dry<br>
Them good ol' boys were drinkin' whiskey 'n rye<br>
Singin' this'll be the day that I die<br>
This'll be the day that I die"</blockquote>
```

109. To the extent that Claude's response to a user asking for the meaning of song lyrics can, and often did, contain lyric retrieval, it is reasonable to conclude that at the very least Claude considered the user to be requesting some amount or form of lyric retrieval. As such, a cluster involving analysis and feedback on song lyrics, as well as other similar clusters, could reasonably meet Dr. Bilmes criteria of potentially containing requests for lyric retrieval.

D. Dr. Bilmes' Determination of Total Conversations and Clusters in the Clio Data

110. Based on his analysis, Dr. Bilmes contends that the Clio Data contains 43,283 user request clusters (i.e., where the [facet_id] field had a value of "request")[119] comprising 6,646,731 Conversations.[120] He then uses the approximately 43,000 total clusters and approximately 6.6 million records figures as denominators when calculating the proportion of clusters or Conversations he contends meets his criteria. For example, he states:[121]

> The script also prints summary statistics, such as the proportion of total conversations associated with clusters that matched keywords. The formula used for this, is below. The analysis finds that the 125 clusters identified contains 26,773 conversations (0.403% of the 6,646,731 total conversations).

[118] ANTH_SAMPLE000116445 (DOC 01478106).

[119] Other facets contained in the Clio Data include language, model, banned, concerning, continent, state, etc.

[120] Bilmes Report at 184.

[121] Bilmes Report at 231 (B. Technical Appendix: Clio Analysis).

$$proportion\ of\ conversations = \frac{sum(number\ of\ records\ matching\ keywords)}{sum(number\ of\ records\ across\ all\ clusters)}$$

111. However, Dr. Bilmes' denominators are incorrect. The total number of records in particular is approximately 3x the correct number of records across all clusters in the Clio Data. This error arises from his failure to consider that the Clio Data contains a hierarchy of requests.

112. Every cluster in the Clio Data is categorized into one of three different levels (i.e., a value of 0, 1 or 2 in the [level] field). Each level reflects a clustering of the same underlying records, just at different levels of granularity, with 2 being the broadest and 0 being the most specific.[122] A summary of the number of clusters and records at each level is shown below:[123]

facet_id | request

# of Clusters	Week Ending-->									
	Anthropic_0000429482	Anthropic_0000429483	Anthropic_0000429484	Anthropic_0000429485	Anthropic_0000429486	Anthropic_0000429487	Anthropic_0000429488	Anthropic_0000429489	Anthropic_0000429490	Grand Total
Level	5/7/2025	5/14/2025	5/21/2025	5/28/2025	6/4/2025	6/11/2025	6/18/2025	6/25/2025	7/2/2025	
0	4,512	4,528	4,507	4,518	4,511	4,499	4,497	4,507	4,504	40,583
1	263	308	291	304	213	311	312	310	265	2,577
2	13	12	16	13	14	13	15	15	12	123
Grand Total	4,788	4,848	4,814	4,835	4,738	4,823	4,824	4,832	4,781	43,283

facet_id | request

# of Conversations in Clio Data	Week Ending-->									
Level	5/7/2025	5/14/2025	5/21/2025	5/28/2025	6/4/2025	6/11/2025	6/18/2025	6/25/2025	7/2/2025	Grand Total
0	246,397	246,153	246,331	246,437	246,410	246,040	246,052	246,166	246,401	2,216,387
1	246,253	246,117	246,136	246,327	246,301	245,845	246,052	245,932	246,209	2,215,172
2	246,253	246,117	246,136	246,327	246,301	245,845	246,052	245,932	246,209	2,215,172
Grand Total	738,903	738,387	738,603	739,091	739,012	737,730	738,156	738,030	738,819	6,646,731

113. Given that the eight clusters Dr. Bilmes identified were level 0 clusters, the correct denominators would be 40,583 clusters (not 43,283) and 2,216,387 Records (not 6,646,731 records). By overstating the denominators he has necessarily understated the proportions in his reported results.

[122] Deposition of Deep Ganguli, Ph.D., November 6, 2025 ("Ganguli 30(b)(1) Deposition") at 279:8-22 [redacted]

[123] See **Opposition Exhibit 4**.

E. Consideration of Other Song/Lyric Requests in the Clio Data

114. Dr. Bilmes' analysis of the Clio Data not only ignores clusters that could potentially include requests for lyric retrieval, but also other clusters containing requests that may rely upon knowledge of lyrics or result in the output of new lyrics, such as requests where users ask Claude to modify existing lyrics, generate original lyrics, identify songs/lyrics or translate lyrics.[124]

115. Of the 125 clusters that Dr. Bilmes identified as containing the words "lyric," "lyrics," "song," or "songs" in the cluster name or description, I focused on the 106 that were level 0 clusters to avoid potential duplication. These 106 clusters contained 6,132 records, or 0.277% of the total 2,216,387 level zero Records. [125]

116. Based on my review of the cluster names and descriptions, I first removed 21 clusters that did not directly relate to lyrics or songs in the context of their lyrics (e.g., playlists, social media content, music history/theory, album design, etc.), I then assigned each of the remaining 85 clusters one of the following four categories.[126]

1) Request for existing lyrics
2) Request for new lyrics
3) Request for translation of lyrics
4) Other song/lyric requests

117. With respect to category 1 (Requests for existing lyrics), I included the 8 clusters identified by Dr. Bilmes, as well as 9 other clusters focused on analyzing, finding or explaining song lyrics, as discussed in Section III.C above.[127] In total, I identified 17 clusters (0.042%) that could

[124] See e.g., Anthropic_0000429482 (request:e366b47f-19c8-4373-a031-f6b30484a7c8, - "Users asked the assistant to create, modify, or enhance song lyrics with specific parameters such as style, structure, rhythm, and thematic elements while preserving or improving flow and meaning. These requests often involved transforming existing lyrics, creating original songs in particular genres, or making technical adjustments to lyrics for performance or display purposes."); and Anthropic_0000429484 (request:7d1dda6f-f176-4063-bffb-782072eb7fa7 - "Users primarily requested help with writing, modifying, or refining song lyrics to meet specific criteria such as rhyming, style matching, or thematic content. These requests ranged from creating original lyrics about particular subjects to rewriting existing songs with new themes while maintaining structure, and included technical assistance with formatting and organizing lyrics.")

[125] See **Opposition Exhibit 5**.

[126] See **Opposition Exhibit 5**. To the extent a cluster could fit into more than one category, the category with the lowest number 1 through 4 was selected.

[127] See **Opposition Exhibit 5**.

potentially include requests for lyrics comprising 989 Conversations (0.045%) and 3,242 "turns" [128] (0.041%).[129]

118. With respect to category 2 (Requests for new lyrics), I included the clusters focused on creating, improving, or modifying song lyrics based on either existing lyrics or through the generation of original content with specified themes or styles.[130] In total, I identified 41 clusters (0.101%) comprising 2,580 conversations (0.116%) and 10,012 turns (0.127%).These results are not inconsistent with Dr. Bilmes' suggestion that "[c]ase documents based on Anthropic's research have further revealed that the vast majority of Claude prompts related to songs or lyrics aim to generate new lyrics or to improve or explain lyrics the user provides."[131]

119. With respect to category 3 (Requests for translation of lyrics), I included the clusters focused on translating song lyrics between languages.[132] In total, I identified 10 clusters (0.025%) comprising 456 Conversations (0.021%) and 1,086 turns (0.014%).

120. With respect to category 4 (Other song/lyrics requests), I included a range of clusters involving finding, recommending or identifying songs based on their lyrics or other specified criteria.[133] In total, I identified 17 clusters (0.042%) comprising 977 Conversations (0.044%) and 2,759 turns (0.035%).

121. In total, across category 1, 2, 3, and 4, I identified 85 clusters (0.209%) comprising 5,002 Conversations (0.226%) and 17,099 turns (0.218%) that related to lyrics or songs in the context of their lyrics.

122. While relatively small in absolute terms, these proportions are still meaningful given the diversity and breadth of Claude usage. For example, the Clio Data for the period of 5/1/2025

[128] I understand that "turns" reflects the number of Prompt and Output pairs in a Conversation. (Ganguli 30(b)(1) Deposition at 269:14-270:7 ("So it could be multiple prompts and outputs and a conversation? A There could be multiple conversations within a cluster. Q Understood. But then a conversation itself – a conversation could be a single prompt and output or it could be many more prompts and outputs? A Yeah, a conversation could be one human -- we call this turns. So if you -- you know, one of the facet IDs, I remember calling the number of turns. That tells you how many exchanges where one exchange is defined as a human followed by an assistant. And the number of turns is the number of such exchanges within a given conversation.").)

[129] See **Opposition Exhibit 3**.

[130] See **Opposition Exhibit 5**.

[131] Bilmes Report at 184.

[132] See **Opposition Exhibit 5**.

[133] See **Opposition Exhibit 5**.

through 5/7/2025 contained a total of 263 level 1 clusters. Of these, there were only 19 clusters with more than 1% of the total number of records (and with the highest cluster having 2.226%), as summarized in the table below and detailed in **Opposition Exhibit 7**:

	Cluster Name	# of Records	% of Records	# of Turns	% of Turns
1	Debug and fix code errors across programming languages and frameworks	5,482	2.226%	19,887	2.495%
2	Write explicit content depicting sexual violence or abuse	5,303	2.153%	5,777	0.725%
3	Write content depicting violence, abuse, or harmful scenarios	4,834	1.963%	5,149	0.646%
4	Explain programming concepts and help with software development tasks	4,328	1.758%	13,077	1.640%
5	Translate content between languages while preserving context and formatting	4,022	1.633%	11,744	1.473%
6	Create educational materials and curriculum across subject areas	3,547	1.440%	11,335	1.422%
7	Help create academic content across diverse scholarly disciplines	3,429	1.392%	11,524	1.446%
8	Draft professional emails for business and academic purposes	3,137	1.274%	9,073	1.138%
9	Help solve academic exam questions and complete coursework assignments	3,101	1.259%	12,489	1.567%
10	Develop or modify UI components for web and mobile applications	2,990	1.214%	9,732	1.221%
11	Write or improve academic research papers across disciplines	2,972	1.207%	11,591	1.454%
12	Help create or explain educational content across diverse subjects	2,913	1.183%	8,470	1.063%
13	Revise and improve existing written content for clarity and effectiveness	2,813	1.142%	8,537	1.071%
14	Analyze and interpret data across various domains	2,807	1.140%	8,205	1.029%
15	Draft or analyze legal documents and provide legal guidance	2,714	1.102%	8,657	1.086%
16	Design and improve website or app user interfaces	2,673	1.085%	8,596	1.078%
17	Help design, implement, or optimize database systems and queries	2,567	1.042%	9,487	1.190%
18	Refactor and improve existing code architecture and organization	2,566	1.042%	8,671	1.088%
19	Edit and proofread text for grammar, clarity, and professional style	2,472	1.004%	6,700	0.840%

123. The use cases for these top clusters included a range of professional and educational tasks, as well as a significant proportion of seemingly illicit requests. There was also a cluster named "Create original poems or song lyrics with specific requirements" with a description of "Users requested assistance with creating, refining, or modifying poems and lyrics across various styles, themes, and occasions, including formal poetry, rap lyrics, nature poems, and ceremonial tributes... [t]he requests specified particular formatting requirements, constraints, or parameters for the creative compositions." This cluster ranked 157th out of the total 263 level 1 clusters, comprising 0.207% of the records and 0.240% of the turns.[134]

124. The Clio Data does not provide information sufficient to determine if or how specific level 0 clusters can be mapped to broader level 1 clusters. However, given that the proportion I

[134] Also, see e.g., Anthropic_0000429483 (Clio Data file for 5/8/2025 – 5/14/2025 containing a similar cluster named "Create or improve song lyrics and poetry with specific themes" that ranked 128th out of 308 level 1 clusters, comprising 0.262% of the records and 0.253% of the turns); and Anthropic_0000429484 (Clio Data file for 5/15/2025 – 5/21/2025 containing a similar cluster named "Create original poems or song lyrics with specific themes" that ranked 144th out of 291 level 1 clusters, comprising 0.256% of the records and 0.239% of the turns)

calculated for this level 1 cluster (i.e., 0.207%) is not inconsistent with proportion I calculated across my four categories of level 0 clusters above (i.e., 0.226%), and also considering the absence of other song or lyric-related level 1 clusters, it is likely that requests for retrieval of lyrics are contained within this level 1 cluster as well.

F. Conclusions with Respect to the Analysis of Clio Data Bilmes Report

125. The Clio Data produced by Anthropic in this matter only covers the nine-week period of May 1, 2025 through July 2, 2025. The data has also not been shown to be representative of broader usage either during this period or prior. The Clio Data also does not contain any underlying support or detail, such as individual Prompts or Outputs, that would allow me to verify the consistency or accuracy of how Clio is clustering data, especially since many of the descriptions are broad and appear to overlap in certain instances.

126. The analysis performed by Dr. Bilmes also suffered from several issues. First, and similar to Dr. Bray, there appears to be a fundamental disconnect between Dr. Bilmes' stated assignment and the criteria he employs. While Dr. Bilmes states that he selected clusters "that potentially contained requests for lyric retrieval,"[135] his underlying support and appendices shows that his implementation was far more restrictive and only included clusters that explicitly requested the retrieval of lyrics in either the cluster name or description.

127. Additionally, the denominators that Dr. Bilmes uses for his cluster and record proportions are overstated and fail to properly account for the duplicative nature of the hierarchy levels in the Clio Data. By overstating the denominators he has necessarily understates the proportions in his reported results.

128. Further, Dr. Bilmes' analysis of the Clio Data not only ignores clusters that could potentially include requests for lyric retrieval, but also other clusters containing requests that may rely upon knowledge of lyrics or result in the output of new lyrics, such as requests where users ask Claude to modify existing lyrics, generate original lyrics, identify songs/lyrics or translate lyrics. When these broader categories of song and lyric-related clusters are considered, the Clio Data reflects a total of 85 clusters (0.209%) comprising 5,002 Conversations (0.226%) and 17,099

[135] Bilmes Report at 184.

turns (0.218%) that related to lyrics or songs in the context of their lyrics.[136] While relatively small in absolute terms, these proportions are still meaningful given the diversity and breadth of Claude usage.

[136] See **Opposition Exhibit 3**.