EXHIBIT 28

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UNITED STATES DISTRICT COURT

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

DEFENDANT ANTHROPIC PBC'S AMENDED RESPONSES AND OBJECTIONS TO PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSIONS (NOS. 1-119)

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PRELIMINARY STATEMENT AND GENERAL OBJECTIONS

1. These Responses are made solely for the purpose of this action. Each Response is subject to all objections as to relevance, materiality, propriety, and admissibility, and any and all other objections and grounds that would require the exclusion of the Responses if such Responses were to be introduced at any hearing or trial of this matter, all of which objections and grounds are reserved and may be interposed at the time of such hearing or trial.

2. These Responses are made solely on Anthropic's behalf, and do not include information from other parties that is not already in Anthropic's possession, custody, or control.

3. Anthropic has attempted in good faith to respond to these Requests, and its Responses are based on information currently available to it at the time of this Response and following the Court's November 26, 2024 Order Resolving Discovery Dispute, Dkt. 273 (the "November 26, 2024 Order"). Anthropic's responses are based on a reasonable inquiry into the information sought and current information in its possession at this time. Anthropic has not completed investigating the facts related to this action, and further discovery, investigation, research, and analysis may supply additional information that could alter the disclosures reflected in these Responses. In light of the continuing discovery and investigation, Anthropic reserves the right to further amend and/or supplement its Responses, and expressly reserves the right to later use and present at trial any evidence, facts, and/or testimony developed or analyzed at a later date that is responsive to the Requests. Notwithstanding the foregoing, Anthropic assumes no obligation to amend and/or supplement its Responses beyond that which is required by law.

4. Anthropic objects to the Requests that purport to impose on Anthropic discovery obligations that exceed those provided for in the Federal Rules of Civil Procedure or in the Local Rules for the United States District Court for the Northern District of California, orders entered in this case, agreements among the parties, or other applicable law.

5. Anthropic objects to the Requests that seek information protected from disclosure by the attorney-client privilege, the work-product doctrine, the common interest doctrine, Fed. R. Civ. P. 26(b)(4)(A), and/or any other applicable privilege, immunity, or protection. The identification or production of any such document or information shall not constitute a waiver of any applicable

objection or privilege. The disclosure of any information or production or identification of documents or communications that are privileged or otherwise immune from discovery shall be handled in accordance with the Protective Order and N.D. Cal. ESI Protocol (Dkt. 298). For the purposes of responding to these Requests, Anthropic will interpret each Request, definition, and instruction as excluding information subject to privilege or immunity.

6. Anthropic objects to the Requests that seek third-party confidential and/or proprietary information and/or information that is subject to or whose disclosure is prohibited by restrictions of confidentiality imposed by, or pursuant to, agreements between Anthropic and third parties. Anthropic will cooperate with Plaintiffs to identify what confidential third party information, if any, is relevant and reasonably necessary for investigation of the claims and defenses herein, subject to notice obligations.

7. Anthropic objects to the Requests that seek information not currently in Anthropic's possession, custody, or control.

8. Anthropic objects to the Requests to the extent they seek information that (i) does not currently exist; (ii) is unavailable; (iii) is only available to be compiled with the expenditure of extraordinary efforts; and/or (iv) may be impractical or impossible to create and/or reasonably capture, resulting in a significant, punitive expense to Anthropic.

9. Anthropic objects to the Requests that prematurely seek to require Anthropic to disclose individuals or information inconsistent with the Federal Rules of Civil Procedure, including Federal Rule of Civil Procedure 26(a)(2) regarding expert testimony, as well as the rules and orders of this Court.

10. Anthropic objects to the Requests to the extent to which any terms used therein are vague, ambiguous, or overbroad.

11. Anthropic objects to the Requests to the extent they are cumulative and duplicative of other discovery requests propounded by Plaintiffs.

12. Anthropic objects to each Request to the extent it is not limited in time and/or geography.

13. Anthropic objects to the Requests to the extent they call for legal conclusions. Any Response by Anthropic shall not be construed as providing a legal conclusion regarding the meaning or application of any terms or phrases used in Plaintiffs' Requests, definitions, or instructions.

14. Anthropic objects to each Request to the extent the definitions or instructions renders a Request compound.

15. Anthropic objects to each Request to the extent it seeks to require Anthropic to do more than conduct an examination of those files or sources that reasonably may be expected to yield responsive information, or an inquiry of those persons who may be reasonably expected to possess responsive information.

16. Anthropic's Response to part or all of any Request is not intended to be, and shall not be construed to be, a waiver of any part of any objection to any Request.

17. Anthropic's willingness to respond to any Request does not constitute an admission that Anthropic agrees with any characterization, definition, or assumption contained in the Request or an assumption or an acknowledgement by Anthropic that the Request is proper, that the information sought is within the proper bounds of discovery, or that demands for similar information will be treated in similar fashion.

18. Anthropic hereby incorporates by reference each and every general objection set forth above into each and every specific Response set forth below, whether or not separately set forth therein. A specific Response may repeat a general objection for emphasis or for some other reason. Failure to include any general objection in any specific Response is not a waiver of any general objection to that Response.

OBJECTIONS TO DEFINITIONS

1. Anthropic objects to the "Definitions" to the extent they purport to impose any obligations on it beyond those set forth in the Federal Rules of Civil Procedure or other applicable rules.

2. Anthropic objects to the Definitions of "Defendant," "Anthropic," "You," or "Your" on the basis that they are overbroad. The inclusion of "any other person or entity . . . previously acting on behalf or at the direction" of Anthropic would unreasonably expand Anthropic's burden

of responding to these Requests. Anthropic will interpret "Defendant," "Anthropic," "You," or "Your" to mean Anthropic PBC, as identified in the First Amended Complaint.

3. Anthropic objects to the definition of "AI" as overbroad and vague because it refers to "artificial intelligence" broadly and is not limited to the general purpose, generative artificial intelligence large language models relevant to the claims and defenses in this case.

4. Anthropic objects to the definition of "Claude" or "Claude AI Models" as overbroad to the extent Plaintiffs use the term "Claude" or "Claude AI Models" to refer to general purpose generative-AI large language models outside the scope of the Court's November 26, 2024 Order, i.e., models that are not relevant to Plaintiffs' claims in this action, including models that were never made commercially available or used to develop commercial Claude, or were not trained on datasets that potentially include Publishers' Works. Anthropic will interpret "Claude" as ordered by the Court in the November 26, 2024 Order (Dkt. 273). For clarity, Anthropic will not interpret Claude to include any versions of Anthropic's general purpose generative AI LLMs for which pre-training began after November 26, 2024.

5. Anthropic objects to the definition of "Claude API" as overbroad to the extent it refers to models, technologies, or products other than the Anthropic application programming interface(s) that allows developers to integrate Claude's (as defined by the Court's November 26, 2024 Order) capabilities into their own applications and services. Anthropic further objects to the definition as nonsensical to the extent it encompasses the "products and customers identified on Anthropic's website at https://www.anthropic.com/customers." These "products and customers" may use an application programming interface offered by Anthropic, but are not themselves the Claude API. Anthropic further objects to the definition as overbroad to the extent it uses the term "Claude" to refer to general purpose generative-AI large language models outside the scope of the Court's November 26, 2024 Order, i.e., models that are not relevant to Plaintiffs' claims in this action, including models that were never made commercially available or used to develop commercial Claude, or were not trained on datasets that potentially include Publishers' Works. Anthropic will interpret "Claude API" to mean the default configuration of the application programming interface(s) that it offers to external developers so that they, in turn, may integrate Claude, as defined

by the Court's November 26, 2024 Order, into their own applications and services.

6. Anthropic objects to the definitions of "identify," "identity," and "identification" on the grounds that they are overbroad to the extent they refer to documents or information beyond the requirements of the Federal Rules of Civil Procedure; documents or information that are not in Anthropic's possession, custody, or control; materials that are not proportionally relevant to the needs of this case; and materials from sources that are not reasonably accessible. Anthropic's Response should not be construed as acquiescence to Plaintiffs' definition of these terms or as a limitation of the scope of Anthropic's defenses or legal positions.

7. Anthropic objects to the definition of "Peer-to-Peer" as overbroad in scope, unduly burdensome, and disproportionate to the needs of the case to the extent it refers to computer networks that are not relevant to Plaintiffs' claims in this action, as asserted in the operative First Amended Complaint. Anthropic further objects to this definition on the grounds that the term "Peer-to-Peer" is vague and ambiguous to the extent it conflates "computer networks," "protocols," and "programs." Anthropic will respond to each Request that incorporates "Peer-to-Peer" to the extent it understands the use of the term in the context of each Request.

8. Anthropic objects to the definition of "Pirate Site" as vague and ambiguous to the extent that it includes the undefined phrases "pirate website," "shadow library," and "online repository for unauthorized copies of copyrighted works or links to same." Anthropic also objects to this Definition as overbroad to the extent that it includes "any . . . other online repository for unauthorized copies of copyrighted works or links to same," which could include any website that hosts or links to any "unauthorized . . . work[]," even inadvertently. Anthropic also objects to this Definition to the extent it calls for a legal conclusion about the potential copyright protections of any materials that may be located on these websites and to the extent it includes the undefined term "pirate." Anthropic objects to this definition on the grounds that the terms "Library Genesis," "Anna's Archive," "Pirate Library Mirror," "Z-library," and "Books3" are vague and ambiguous to the extent the definition assumes that each dataset or repository is a static enterprise.

9. Anthropic objects to the definition of "Training Corpus" as vague and ambiguous to the extent it refers to "the entire corpus of data and information used to train a generative AI model,

including data provided through interactions with other AI Models." Anthropic further objects to this definition's inclusion of the phrase "including data provided through interactions with other AI Models" to the extent that it differs from or contradicts the definition that Publishers have used for the term "Training Corpus" in other discovery. Anthropic will interpret "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order.

10. Anthropic objects to the definition "Works" or "Publishers' Works" as vague and ambiguous to the extent it refers to "musical compositions, including their lyrics, that are listed in Exhibit A to the Complaint, Dkt. 337-2, because Plaintiffs have represented that they may seek to amend this list, and because Exhibit A to the Complaint is Dkt. 337-1, not Dkt. 337-2. For purposes of these Requests, Anthropic will construe "Works" or "Publishers' Works" to refer to the musical compositions, including their lyrics, listed in Exhibit A to the Complaint at Dkt. 337-1 and only those musical compositions listed in Exhibit A to the Complaint at Dkt -1. To the extent that Plaintiffs amend or change the definition of "Works" or "Publishers' Works," as used in these Requests, or amend the musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1, Anthropic reserves all rights, including to supplement or amend its Responses.

11. Anthropic objects to Plaintiffs' failure to define terms that are vague, ambiguous, and/or subject to varying interpretations. Where possible, Anthropic will make a reasonable effort to respond to each Request to the extent not otherwise objectionable, based upon its understanding and interpretation of the Request, including by interpreting each undefined term or phrase in accordance with its ordinary meaning. If Plaintiffs subsequently assert any interpretation of any Request that differs from Anthropic's interpretation, Anthropic reserves the right to supplement or amend its objections and Responses.

OBJECTIONS TO INSTRUCTIONS

12. Anthropic objects to the "Instructions" to the extent they purport to impose any obligations on it beyond those set forth in the Federal Rules of Civil Procedure or other applicable rules.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that Anthropic's primary product is a series of AI models collectively referred to as "Claude."

RESPONSE TO ADMISSION NO. 1:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "primary product" is vague and ambiguous. Anthropic further objects on grounds that the phrase "series of AI models" is vague and ambiguous. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatory No. 14, which it incorporates by reference. Anthropic further objects to this Request as not proportional to the needs of this case to the extent it seeks a Response with respect to "a series of AI models" which are not at-issue in this case or that have not yet been released as of the date of these Responses, and that might never be released commercially.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that it is an AI safety and research company, and that its primary commercial product is a family of general purpose, generative-AI large language models known as Claude. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 2:

Admit that Anthropic provides access to its Claude AI Models through Anthropic's website (https://claude.ai), as a mobile application, as a desktop program, and as a commercial Application Programming Interface ("API").

RESPONSE TO ADMISSION NO. 2:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome,

and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that terms "mobile application," "desktop program," and "commercial Application Programming Interface ("API")" are vague and ambiguous. Anthropic defines "mobile application" and "desktop program" to mean the product offerings available through Windows and macOS operating systems and the Apple and Google App stores as reflected at https://claude.ai/download as of the date of these Responses. Anthropic defines "commercial Application Programming Interface to mean the product offerings reflected at https://www.anthropic.com/api as of the date of these Responses. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is equally accessible to Publishers, has already been made available to Publishers, or is duplicative of discovery that has already been served.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Admitted.

REQUEST FOR ADMISSION NO. 3:

Admit that Anthropic controls, owns, and operates its Claude AI Models.

RESPONSE TO ADMISSION NO. 3:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the terms "controls," "owns," and "operates" are vague and ambiguous. Anthropic defines those terms pursuant to their plain meaning. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that

such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatory No. 14, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that Anthropic PBC, as identified in the First Amended Complaint, owns, controls, and operates a series of commercial, general purpose, generative-AI large language models known as Claude. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 4:

Admit that Anthropic has the unilateral ability to shut down its Claude AI Models.

RESPONSE TO ADMISSION NO. 4:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the terms "unilateral ability" and "shut down" are vague and ambiguous. Anthropic objects to the extent this Request calls for a legal conclusion. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 5:

Admit that Anthropic has the unilateral ability to revoke access to its Claude AI Models.

RESPONSE TO ADMISSION NO. 5:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date

of these Responses. Anthropic objects to this Request on the grounds that the terms "unilateral ability" and "revoke access" are vague and ambiguous. Anthropic objects to the extent this Request calls for a legal conclusion."

Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that it has a published Usage Policy, available at https://www.anthropic.com/legal/aup, that defines its ability to throttle, suspend, or terminate a user's access to Anthropic PBC's products and services. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 6:

Admit that Anthropic can program its Claude AI Models to alter the outputs delivered by these Models before the output are shown to users.

RESPONSE TO ADMISSION NO. 6:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the terms "program," "alter," "outputs," "delivered," and "shown to users," are vague and ambiguous. Anthropic objects to this Request as vague and ambiguous to the extent it is unclear what an "output…before the output [] shown to users" is. For purposes of responding to this Request, Anthropic interprets "output" to be the response that a user receives after entering a prompt into a Claude AI Model. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatories No. 9 and 12, which it

incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that it can implement guardrails in its systems that attempt to prevent certain outputs, for example through use of its Content Compare System. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 7:

Admit that Anthropic refers to the process of teaching its Claude AI Models to generate textual output in response to written user prompts as "training."

RESPONSE TO ADMISSION NO. 7:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on the grounds that it seeks definition of the term "training" without context. Anthropic objects to this Request on the grounds that it is unclear what it means for "Anthropic" as an entity to "refer" to a term. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the terms "process," "generate textual output," "written user prompts," and "training" are vague and ambiguous. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatory No. 9, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that in general and depending on context, "training" may refer to some or all of the complex and iterative process of inputting a vast dataset of "tokens" into a neural network that analyzes those tokens to discover patterns and extract statistical information to develop a probabilistic but comprehensive map of how human language works, to develop a large language

model with a generalized understanding of language patterns that can understand a virtually limitless array of potential user prompts, and produce a broad range of novel outputs in response. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 8:

Admit that Anthropic trains its Claude AI Models to generate text output in response to user prompts.

RESPONSE TO ADMISSION NO. 8:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the term "trains" and the phrase "generate text output in response to user prompts" are vague and ambiguous. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatory No. 9, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that Claude is trained to generate text output in response to user prompts. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 9:

Admit that Anthropic controls all aspects of training for its Claude AI Models.

RESPONSE TO ADMISSION NO. 9:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date

of these Responses. Anthropic objects to this Request on the grounds that the phrase "controls all aspects" and the term "training" are vague and ambiguous. Anthropic also objects to this Request as vague and ambiguous to the extent that Plaintiffs fail to explain what it means for "Anthropic" as an entity, and not a person, to "control all aspects of training" the Claude AI Models. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatories No. 6, 9, and 12, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Denied. Training Claude is a multi-phase process that includes, among other things, use of synthetic data and machine learning techniques, such that the model can learn on its own.

REQUEST FOR ADMISSION NO. 10:

Admit that Anthropic periodically adjusts the training parameters for its Claude AI Models.

RESPONSE TO ADMISSION NO. 10:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the terms "periodically," "adjusts" and "training parameters," are vague and ambiguous. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatories No. 6, 9, and 12, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that since commercially releasing Claude to select business customers in late 2022, Anthropic has iterated upon its process for training Claude AI Models and continues to make improvements. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 11:

Admit that Anthropic uses a Training Corpus to train its Claude AI Models.

RESPONSE TO ADMISSION NO. 11:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the phrase "uses a Training Corpus to train" as vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatories No. 6, 9, and 12, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that Claude learns language patterns and the relationship between words and phrases by analyzing data in a Training Corpus. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 12:

Admit that Anthropic selects the contents of the Training Corpus it uses to train Claude AI Models.

RESPONSE TO ADMISSION NO. 12:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome,

and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the phrase "selects the contents of the Training Corpus it uses to train" as vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatories No. 6, 9, 10, 11, and 12, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that it identifies, cleans and processes the data used to train its models. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 13:

Admit that Anthropic makes copies of the text contained in the Training Corpus used to train the Claude AI Models.

RESPONSE TO ADMISSION NO. 13:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic further objects to this Request to the extent the Request seeks forensic-level data extraction or technical analysis of digital devices or software, particularly where such data may not be readily accessible. Anthropic objects to this Request on the grounds that the phrase "makes copies of the text contained in the Training Corpus" as vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to

mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatories No. 6, 9, and 12, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that text within the datasets used to train Claude is copied into a computer-readable format during the training process, for the purpose of teaching Claude to generate new, original content in response to a wide range of possible user inquiries. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 14:

Admit that Anthropic trains its Claude AI Models with human-written text.

RESPONSE TO ADMISSION NO. 14:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the terms "trains" and "human written text" are vague and ambiguous. For purposes of this Request, Anthropic defines "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic also objects to this Request as vague and ambiguous to the extent that Plaintiffs fail to explain what it means for "Anthropic" as an entity to "train" Claude AI Models. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery

that has already been served, including its Responses to Interrogatories No. 6, 9, and 12, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that Claude is trained using tokens, which are basic semantic units that can be represented mathematically and can correspond to words, subwords, or characters, some of which may be written by humans. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 15:

Admit that Anthropic highly values human-written text for purposes of training its Claude AI Models.

RESPONSE TO ADMISSION NO. 15:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the terms "highly values," and the phrase "human-written text for purposes of training" are vague and ambiguous. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatories No. 6, 9, and 12, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Anthropic admits that Claude is trained using tokens, which are basic semantic units that can be represented mathematically and can correspond to words, subwords, or characters, some of which may be written by humans. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 16:

Admit that Anthropic prioritizes training its Claude AI Models with human-written text over

non-human-written text.

RESPONSE TO ADMISSION NO. 16:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the terms "prioritizes training," "human-written text" and "non-human-written-text" are vague and ambiguous. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatories No. 6, 9, and 12, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 17:

Admit that Claude AI Models generate textual output based on the contents of their Training Corpus.

RESPONSE TO ADMISSION NO. 17:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to this Request on the grounds that the phrase "generate textual output based on the contents of their Training Corpus" is vague and ambiguous. For purposes of this Request, Anthropic defines "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects further on

the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatories No. 6, 9, and 12, which it incorporates by reference.

Subject to and without waving the foregoing objections Anthropic responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 18:

Admit that the Training Corpus used to train the Claude AI Models contains the lyrics to at least one of Publishers' Works.

RESPONSE TO ADMISSION NO. 18:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to the terms "Training Corpus" "used to train" as vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to the definition "Works" or "Publishers' Works" as vague and ambiguous to the extent it refers to "musical compositions, including their lyrics, that are listed in Exhibit A to the Complaint, Dkt. 337-2, because Plaintiffs have represented that they may seek to amend this list, and because Exhibit A to the Complaint is Dkt. 337-1, not Dkt. 337-2. For purposes of these Requests, Anthropic will construe "Works" or "Publishers' Works" to refer to the musical compositions, including their lyrics, listed in Exhibit A to the Complaint at Dkt. 337-1 and only those musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1. To the extent that Plaintiffs amend or change the definition of "Works" or "Publishers' Works," as used in these Requests, or amend the musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1, Anthropic reserves all rights, including to supplement or amend its Responses. Anthropic objects to

the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further objects to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, and at least one Claude model was trained on a dataset containing the lyrics to one or more of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 19:

Admit that the Training Corpus used to train the Claude AI Models contains the lyrics to ten (10) or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 19:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to the terms "Training Corpus" "used to train" as vague and

ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to the definition "Works" or "Publishers' Works" as vague and ambiguous to the extent it refers to "musical compositions, including their lyrics, that are listed in Exhibit A to the Complaint, Dkt. 337-2, because Plaintiffs have represented that they may seek to amend this list, and because Exhibit A to the Complaint is Dkt. 337-1, not Dkt. 337-2. For purposes of these Requests, Anthropic will construe "Works" or "Publishers' Works" to refer to the musical compositions, including their lyrics, listed in Exhibit A to the Complaint at Dkt. 337-1 and only those musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1. To the extent that Plaintiffs amend or change the definition of "Works" or "Publishers' Works," as used in these Requests, or amend the musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1, Anthropic reserves all rights, including to supplement or amend its Responses. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic further objects to this Request as unduly burdensome insofar as Anthropic offered to stipulate to existence of lyrics in its training data with Publishers, which Publishers rejected. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are not composed primarily of lyrics. Anthropic further object to this Request on grounds that such information is and has already been made available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly

burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, and at least one Claude model was trained on a dataset containing the lyrics to ten (10) or more of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 20:

Admit that the Training Corpus used to train the Claude AI Models contains the lyrics to one hundred (100) or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 20:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to the terms "Training Corpus" "used to train" as vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to the definition "Works" or "Publishers' Works" as vague and ambiguous to the extent it refers to "musical compositions, including their lyrics, that are listed in Exhibit A to the Complaint, Dkt. 337-2, because Plaintiffs have represented that they may seek to amend this list, and because Exhibit A to the Complaint is Dkt. 337-1, not Dkt. 337-2. For purposes of these Requests, Anthropic will construe "Works" or "Publishers' Works" to refer to the musical compositions, including their lyrics, listed in Exhibit A to the Complaint at Dkt. 337-1 and only those musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1. To the extent that Plaintiffs amend or change the definition of "Works" or "Publishers' Works," as used in these Requests, or amend the musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1, Anthropic reserves all rights, including to supplement or amend its Responses. Anthropic objects to

the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are not composed primarily of lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, and at least one Claude model was trained on a dataset containing the lyrics to at least one hundred (100) of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 21:

Admit that the Training Corpus used to train the Claude AI Models contains the lyrics to each of Publishers' Works.

RESPONSE TO ADMISSION NO. 21:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI

Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to the terms "Training Corpus" "used to train" as vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to the definition "Works" or "Publishers' Works" as vague and ambiguous to the extent it refers to "musical compositions, including their lyrics, that are listed in Exhibit A to the Complaint, Dkt. 337-2, because Plaintiffs have represented that they may seek to amend this list, and because Exhibit A to the Complaint is Dkt. 337-1, not Dkt. 337-2. For purposes of these Requests, Anthropic will construe "Works" or "Publishers' Works" to refer to the musical compositions, including their lyrics, listed in Exhibit A to the Complaint at Dkt. 337-1 and only those musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1. To the extent that Plaintiffs amend or change the definition of "Works" or "Publishers' Works," as used in these Requests, or amend the musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1, Anthropic reserves all rights, including to supplement or amend its Responses. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are not composed primarily of lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly

burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, and at least one Claude model was trained on a dataset containing the lyrics to one or more of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 22:

Admit the Training Corpus for the Claude AI Models contains the "Common Crawl" dataset.

RESPONSE TO ADMISSION NO. 22:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to the terms "Training Corpus" as vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request on grounds that the term "Common Crawl" is vague and ambiguous, as Common Crawl is a dataset created by a third party which may exist in different versions. Anthropic further object to this Request on grounds that such information is and has already been made available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

At least one commercially released and generally accessible Claude model was trained using data it obtained from Common Crawl, a free, open repository of web crawl data that can be used by anyone. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 23:

Admit that the Common Crawl dataset contains copies of the lyrics to Publishers' Works that were copied from the website LyricFind.com.

RESPONSE TO ADMISSION NO. 23:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "the Common Crawl dataset" is vague and ambiguous, as Common Crawl is a dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics—and the source from which they are derived—within any of the different versions of the Common Crawl dataset, which contains billions of unique URLs. Anthropic further object to this Request on grounds that such information is and has already been made available to Publishers through access to the inspection environment, is information that is equally accessible to Publishers through the Common Crawl website (https://commoncrawl.org/), or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic lacks information sufficient to admit or deny if any Common Crawl dataset contains lyrics crawled from the website LyricFind.com. Therefore, denied.

REQUEST FOR ADMISSION NO. 24:

Admit that the Common Crawl dataset contains copies of the lyrics to Publishers' Works that were copied from the website Musixmatch.com.

RESPONSE TO ADMISSION NO. 24:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "the Common Crawl dataset" is vague and

ambiguous, as Common Crawl is a dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics—and the source from which they are derived—within any of the different versions of the Common Crawl dataset, which contains billions of unique URLs. Anthropic further object to this Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic lacks information sufficient to admit or deny if any Common Crawl dataset contains lyrics crawled from the website Musixmatch.com. Therefore, denied.

REQUEST FOR ADMISSION NO. 25:

Admit that the Common Crawl dataset contains copies of the lyrics to Publishers' Works that were copied from the website Genius.com.

RESPONSE TO ADMISSION NO. 25:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "the Common Crawl dataset" is vague and ambiguous, as Common Crawl is a dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics—and the source from which they are derived—within any of the different versions of the Common Crawl dataset, which contains billions of unique URLs. Anthropic further object to this

Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic lacks information sufficient to admit or deny if any Common Crawl dataset contains lyrics crawled from the website Genius.com. Therefore, denied.

REQUEST FOR ADMISSION NO. 26:

Admit that the Common Crawl dataset contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 26:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to this Request on grounds that the term "the Common Crawl dataset" is vague and ambiguous, as Common Crawl is a dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics—and the source from which they are derived—within any of the different versions of the Common Crawl dataset, which contains billions of unique URLs. Anthropic further object to this Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic lacks information sufficient to admit or deny if any Common Crawl dataset contains lyrics to one or more of Publishers' Works. Therefore, denied.

REQUEST FOR ADMISSION NO. 27:

Admit that the Common Crawl dataset contains the lyrics to ten (10) or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 27:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "the Common Crawl dataset" is vague and ambiguous, as Common Crawl is a dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics—and the source from which they are derived—within any of the different versions of the Common Crawl dataset, which contains billions of unique URLs. Anthropic further object to this Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic lacks information sufficient to admit or deny if any Common Crawl dataset contains lyrics to ten (10) or more of Publishers' Works. Therefore, denied.

REQUEST FOR ADMISSION NO. 28:

Admit that the Common Crawl dataset contains the lyrics to one hundred (100) or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 28:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "the Common Crawl dataset" is vague and ambiguous, as Common Crawl is a dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics—and the source from which they are derived—within any of the different versions of the Common Crawl dataset, which contains billions of unique URLs. Anthropic further object to this Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic lacks information sufficient to admit or deny if any Common Crawl dataset contains lyrics to one hundred (100) or more of Publishers' Works. Therefore, denied.

REQUEST FOR ADMISSION NO. 29:

Admit that the Common Crawl dataset contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 29:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "the Common Crawl dataset" is vague and ambiguous, as Common Crawl is a dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to

this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics—and the source from which they are derived—within any of the different versions of the Common Crawl dataset, which contains billions of unique URLs. Anthropic further object to this Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic lacks information sufficient to admit or deny if any Common Crawl dataset contains lyrics to each of Publishers' Works. Therefore, denied.

REQUEST FOR ADMISSION NO. 30:

Admit the Training Corpus used to train the Claude AI Models contains the "Pile" dataset.

RESPONSE TO ADMISSION NO. 30:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as vague and ambiguous and also overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it seeks a Response for "Claude AI Models" beyond its commercially released and generally accessible Claude models as of the date of these Responses. Anthropic objects to the terms "Training Corpus" as vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to the definition "Works" or "Publishers' Works" as vague and ambiguous to the extent it refers to "musical compositions, including their lyrics, that are listed in Exhibit A to the Complaint, Dkt. 337-2, because Plaintiffs have represented that they may seek to amend this list, and because Exhibit A to the Complaint is Dkt. 337-1, not Dkt. 337-2. For purposes of these Requests, Anthropic will construe "Works" or "Publishers' Works" to refer to the musical compositions, including their lyrics, listed in Exhibit A to the Complaint at Dkt. 337-1 and only

those musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1. To the extent that Plaintiffs amend or change the definition of "Works" or "Publishers' Works," as used in these Requests, or amend the musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1, Anthropic reserves all rights, including to supplement or amend its Responses. Anthropic objects to this Request on grounds that the term "the Pile" is vague and ambiguous, as the Pile is a compilation of datasets created by a third party which may exist in different versions. Anthropic further objects to this Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

At least one commercially released and generally accessible Claude model was trained on data from the compilation of public datasets that Anthropic understands to be versions of the Pile, a free, open repository data that can be used by anyone. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 31:

Admit that the Pile dataset includes the "YouTube Subtitles" dataset.

RESPONSE TO ADMISSION NO. 31:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "the Pile" is vague and ambiguous, as the Pile is a compilation of datasets created by a third party which may exist in different versions. Anthropic further object to this Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic admits that the publicly accessible documentation for the Pile (available at https://arxiv.org/pdf/2101.00027) indicates that it includes "datasets derived from the following sources" including "YouTube" including "YouTube Subtitles." Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 32:

Admit that the Pile dataset contains the lyrics to at least one of Publishers' Works.

RESPONSE TO ADMISSION NO. 32:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "the Pile" is vague and ambiguous, as the Pile is a compilation of datasets created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics—and the source from which they are derived—within the Pile dataset, an 825 GiB data set. Anthropic further object to this Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic lacks information sufficient to admit or deny if the Pile contains lyrics to one or more of Publishers' Works. Therefore, denied.

REQUEST FOR ADMISSION NO. 33:

Admit that the Pile dataset contains the lyrics to ten (10) or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 33:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "the Pile" is vague and ambiguous, as the Pile is a compilation of datasets created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent

it requires Anthropic to identify and rule out the existence or non-existence of lyrics—and the source from which they are derived—within the Pile dataset, an 825 GiB data set. Anthropic further object to this Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic lacks information sufficient to admit or deny if the Pile contains lyrics to ten (10) or more of Publishers' Works. Therefore, denied.

REQUEST FOR ADMISSION NO. 34:

Admit that the Pile dataset contains the lyrics to one hundred (100) or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 34:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "the Pile" is vague and ambiguous, as the Pile is a compilation of datasets created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics—and the source from which they are derived—within the Pile dataset, an 825 GiB data set. Anthropic further object to this Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic lacks information sufficient to admit or deny if the Pile contains lyrics to one hundred (100) or more of Publishers' Works. Therefore, denied.

REQUEST FOR ADMISSION NO. 35:

Admit that the Pile dataset contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 35:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request on grounds that the term "the Pile" is vague and ambiguous, as the Pile is a compilation of datasets created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics—and the source from which they are derived—within the Pile dataset, an 825 GiB data set. Anthropic further object to this Request on grounds that such information is publicly available and/or equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing objections, Anthropic responds as follows:

Anthropic lacks information sufficient to admit or deny if the Pile contains lyrics to each of Publishers' Works. Therefore, denied.

REQUEST FOR ADMISSION NO. 36:

Admit that Anthropic downloaded one or more books from Library Genesis ("LibGen") using BitTorrent.

RESPONSE TO ADMISSION NO. 36:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "one or more books" "downloaded" from "Library Genesis ('LibGen') using BitTorrent" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "Library Genesis "('LibGen')," "download[]" or "BitTorrent" or what "one or more" means and to the extent that "LibGen" is a massive dataset created by a third party which may exist in different versions. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 37:

Admit that Anthropic downloaded over one million books from LibGen using BitTorrent.

RESPONSE TO ADMISSION NO. 37:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "books" "downloaded" from "LibGen

using BitTorrent" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds Plaintiffs have not defined the terms "LibGen," "download[]" or "BitTorrent" or what "over one million" means and to the extent that "LibGen" is a massive dataset created by a third party which may exist in different versions. Anthropic further objects to this Request to the extent it purports to impute to Anthropic full knowledge of the contents of the Library Genesis dataset. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 38:

Admit that Anthropic downloaded the lyrics to one or more of Publishers' Works from LibGen using BitTorrent.

RESPONSE TO ADMISSION NO. 38:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "download[s]" from "LibGen using BitTorrent" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds Plaintiffs have not defined the terms "LibGen," "download[]" or "BitTorrent" or what "one or more" means and to the extent that "LibGen" is a massive dataset

created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 39:

Admit that Anthropic uploaded the lyrics to one or more of Publishers' Works from LibGen using BitTorrent.

RESPONSE TO ADMISSION NO. 39:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "upload[s]" from "LibGen using BitTorrent" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds Plaintiffs have not defined the terms "LibGen," "upload[]" or "BitTorrent" or what "one or more" means and to the extent that "LibGen" is a massive dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics

and in what quantity. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 40:

Admit that Anthropic downloaded one or more books from Pirate Library Mirror ("PiLiMi") using BitTorrent.

RESPONSE TO ADMISSION NO. 40:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "one or more books" "downloaded" from "Pirate Library Mirror ("PiLiMi') using BitTorrent" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "Pirate Library Mirror ('PiLiMi')," "download[]" or "BitTorrent" or what "one or more" means and to the extent that "PiLiMi" is a massive dataset created by a third party which may exist in different versions. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 41:

Admit that Anthropic downloaded over one million books from PiLiMi using BitTorrent.

RESPONSE TO ADMISSION NO. 41:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "books" "downloaded" from "PiLiMi using BitTorrent" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds Plaintiffs have not defined the terms "PiLiMi," "download[]" or "BitTorrent" or what "over one million" means and to the extent that "PiLiMi" is a massive dataset created by a third party which may exist in different versions. Anthropic further objects to this Request to the extent it purports to impute to Anthropic full knowledge of the contents of the PiLiMi dataset. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 42:

Admit that Anthropic downloaded the lyrics to one or more of Publishers' Works from PiLiMi using BitTorrent.

RESPONSE TO ADMISSION NO. 42:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or

more of Publisher's Works." Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "download[s]" from "PiLiMi using BitTorrent" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds Plaintiffs have not defined the terms "PiLiMi," "download[]" or "BitTorrent" or what "one or more" means and to the extent that "PiLiMi" is a massive dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 43:

Admit that Anthropic uploaded the lyrics to one or more of Publishers' Works from PiLiMi using BitTorrent.

RESPONSE TO ADMISSION NO. 43:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second

Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "upload[s]" from "PiLiMi using BitTorrent" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds Plaintiffs have not defined the terms "PiLiMi," "upload[]" or "BitTorrent" or what "one or more" means and to the extent that "PiLiMi" is a massive dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 44:

Admit that Anthropic downloaded one or more books from Books3 using BitTorrent.

RESPONSE TO ADMISSION NO. 44:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "one or more books" "downloaded" from "Books3 using BitTorrent" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "Books3," "download[]" or "BitTorrent" or what "one or more"

means and to the extent that "Books3" is a massive dataset created by a third party which may exist in different versions. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 45:

Admit that Anthropic downloaded one or more books from Books3.

RESPONSE TO ADMISSION NO. 45:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "one or more books" "downloaded" from "Books3" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "Books3" or "download[]" or what "one or more" means and to the extent that "Books3" is a massive dataset created by a third party which may exist in different versions. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 46:

Admit that Anthropic downloaded the lyrics to one or more of Publishers' Works from Books3 using BitTorrent.

RESPONSE TO ADMISSION NO. 46:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "download[s]" from "Books3 using BitTorrent" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds Plaintiffs have not defined the terms "Books3," "download[]" or "BitTorrent" or what "one or more" means and to the extent that "Books3" is a massive dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 47:

Admit that Anthropic uploaded the lyrics to one or more of Publishers' Works from Books3 using BitTorrent.

RESPONSE TO ADMISSION NO. 47:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "upload[s]" from "Books3 using BitTorrent" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds Plaintiffs have not defined the terms "Books3," "upload[]" or "BitTorrent" or what "one or more" means and to the extent that "Boks3" is a massive dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 48:

Admit that the materials Anthropic downloaded from Books3 includes lyrics to at least one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 48:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or

more of Publisher's Works." Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "download[s]" from "Books3" neither of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds Plaintiffs have not defined the terms "materials," "Books3," or "download[]" or what "one or more" means and to the extent that "Books3" is a massive dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 49:

Admit that Anthropic downloaded one or more books from Internet Archive.

RESPONSE TO ADMISSION NO. 49:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "one or more books" "downloaded"

from "Internet Archive" none of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "Internet Archive" or "download[]" or what "one or more" means and to the extent that "Books3" is a massive dataset created by a third party which may exist in different versions. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 50:

Admit that the materials Anthropic downloaded from Internet Archive includes lyrics to at least one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 50:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to this Request as unduly burdensome and not proportional to the claims presently at-issue in this case, including but not limited to because they appear to be directed at claims that are subject to Plaintiffs' Motion for Leave to File Second Amended Complaint, which has not yet been adjudicated. Anthropic objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding "download[s]" from "Internet Archive" neither of which is at-issue in this case or relevant to any of Plaintiffs' claims. Anthropic further objects to this Request as vague and ambiguous on the grounds Plaintiffs have not defined the terms "materials," "Internet Archive," or "download[]" or what "one or more" means and to the extent that "Internet Archive" is a massive dataset created by a third party which may exist in different versions. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the

"Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 51:

Admit that the Training Corpus for Claude 1 contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 51:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet and Anthropic does not know all the contents of those datasets. Anthropic objects to

this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 52:

Admit that the Training Corpus for Claude 1 contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 52:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics

within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further objects to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 53:

Admit that the Training Corpus for Claude 2 contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 53:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of

materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 54:

Admit that the Training Corpus for Claude 2 contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 54:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and

ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 55:

Admit that the Training Corpus for Claude 2.1 contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 55:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 56:

Admit that the Training Corpus for Claude 2.1 contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 56:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as

compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 57:

Admit that the Training Corpus for Claude 3 Haiku contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 57:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope,

unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 58:

Admit that the Training Corpus for Claude 3 Haiku contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 58:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to

the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 59:

Admit that the Training Corpus for Claude 3 Sonnet contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 59:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the

grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 60:

Admit that the Training Corpus for Claude 3 Sonnet contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 60:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works

listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 61:

Admit that the Training Corpus for Claude 3 Opus contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 61:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly

burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 62:

Admit that the Training Corpus for Claude 3 Opus contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 62:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are

composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 63:

Admit that the Training Corpus for Claude 3.5 Haiku contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 63:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic

to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 64:

Admit that the Training Corpus for Claude 3.5 Haiku contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 64:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to

mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic objects to this Request as unduly burdensome to the extent it would require Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 65:

Admit that the Training Corpus for Claude 3.5 Sonnet contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 65:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or

more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 66:

Admit that the Training Corpus for Claude 3.5 Sonnet contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 66:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 67:

Admit that the Training Corpus for Claude 3.5 Sonnet v.2 contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 67:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources

unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 68:

Admit that the Training Corpus for Claude 3.5 Sonnet v.2 contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 68:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including

portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 69:

Admit that the Training Corpus for Claude 3.7 Sonnet contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 69:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of

materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 70:

Admit that the Training Corpus for Claude 3.7 Sonnet contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 70:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or

some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of this Request, Anthropic the term "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, which may contain the lyrics to at least one of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 71:

Admit that the Training Corpus for Claude 4 Sonnet contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 71:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks about a Claude model outside the scope of the definition of "Claude" as defined in the Court's November 26, 2024 Order and as identified in Anthropic's Supplemental Response to Interrogatory 14. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as

compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 72:

Admit that the Training Corpus for Claude 4 Sonnet contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 72:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks about a Claude model outside the scope of the definition of "Claude" as defined in the Court's November 26, 2024 Order and as identified in Anthropic's Supplemental Response to Interrogatory 14. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are

composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 73:

Admit that the Training Corpus for Claude 4 Opus contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 73:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from

the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, and that the training dataset for Claude 4 Opus contains the lyrics to one or more of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 74:

Admit that the Training Corpus for Claude 4 Opus contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 74:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or

otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, and that the training dataset for Claude 4 Opus model contains the lyrics to one or more of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 75:

Admit that the Training Corpus for Claude 4.1 Opus contains the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 75:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks about a Claude model

outside the scope of the definition of "Claude" as defined in the Court's November 26, 2024 Order and as identified in Anthropic's Supplemental Response to Interrogatory 14. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the terms "contains" or "one or more." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, and that the training dataset for Claude 4.1 Opus contains the

lyrics to one or more of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 76:

Admit that the Training Corpus for Claude 4.1 Opus contains the lyrics to all of Publishers' Works.

RESPONSE TO ADMISSION NO. 76:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks about a Claude model outside the scope of the definition of "Claude" as defined in the Court's November 26, 2024 Order and as identified in Anthropic's Supplemental Response to Interrogatory 14. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contains." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to

Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it trains its models on massive amounts of data, including portions of datasets sourced from the internet, and that the training dataset for Claude 4.1 Opus contains the lyrics to one or more of Publishers' Works listed at Dkt. 337-1. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 77:

Admit that the lyrics to one or more of Publishers' Works are contained in the Training Corpus for one or more Claude AI Models that have not been released to the public.

RESPONSE TO ADMISSION NO. 77:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound, to the extent that the Request seeks information for "one or more of Publisher's Works." Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as vague and ambiguous on the grounds that Plaintiffs have not defined the term "contained" or the phrases "one or more" or "released to the public." Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks about a Claude AI models outside the scope of the definition of "Claude" as defined in the Court's November 26, 2024 Order and as identified in Anthropic's Supplemental Response to Interrogatory 14. Anthropic

further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 78:

Admit that the lyrics to each of Publishers' Works are contained in the Training Corpus for at least one Claude AI Model that is currently under development but not yet been released.

RESPONSE TO ADMISSION NO. 78:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks about Claude models outside the scope of the definition of "Claude" as defined in the Court's November

26, 2024 Order and as identified in Anthropic's Supplemental Response to Interrogatory 14. Anthropic additionally objects to this Request as vague on grounds that Plaintiffs have not defined the terms "currently," "development," or "released," nor the phrase "at least one Claude AI Model that is currently under development but not yet been released." Anthropic also objects to this Request as unduly burdensome to the extent that it asks Anthropic to provide information about at least hundreds of works in a single Request. Anthropic further objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it requires Anthropic to identify and rule out the existence or non-existence of lyrics within the Training Corpus: Anthropic trains its models on massive amounts of data, including portions of datasets sourced from the Internet (such as, without limitation, components of Common Crawl) and Anthropic does not know all the contents of those datasets. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks Anthropic to undertake to identify lyrics within any training datasets that are composed primarily of sources unlikely to contain lyrics. Anthropic further object to this Request on grounds that such information is equally available to Publishers through access to the inspection environment or is duplicative of discovery that has already been served, including its Responses to Interrogatory 6, which it incorporates by reference. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic does not intend to respond to this Request, based on the above objections.

REQUEST FOR ADMISSION NO. 79:

Admit that Anthropic copies the lyrics to Publishers' Works while training its Claude AI Models.

RESPONSE TO ADMISSION NO. 79:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether

they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as vague because Plaintiffs have not defined the terms "copies" and "while training." Anthropic also objects to this Request insofar as it calls for a legal conclusion. Anthropic additionally objects that this Request seeks premature expert discovery. Anthropic objects to this Request as overbroad in scope, unduly burdensome, and not proportional to the needs of the case to the extent it asks about Claude models outside the scope of the definition of "Claude" as defined in the Court's November 26, 2024 Order and as identified in Anthropic's Supplemental Response to Interrogatory 14. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic objects to this Request as unduly burdensome to the extent it would require Anthropic to search for the lyrics of "each" of Publishers' hundreds of works-in-suit (Dkt. 337-1) across training datasets for its Claude AI Models. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that text within the datasets used to train Claude is copied into a computer-readable format during the training process, for the purpose of teaching Claude to generate new, original content in response to a wide range of possible user inquiries. To the extent that the full or partial lyrics to Publishers' Works are or were contained in any of the training datasets used to train Claude, those lyrics would have been so copied pursuant to that purpose. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 80:

Admit that Anthropic chooses what content to clean, filter, or remove from the Training Corpus for its Claude AI Models.

RESPONSE TO ADMISSION NO. 80:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request as compound because it asks for a Response to three distinct questions

regarding three different processes: "clean[ing]," "filter[ing]," and "remov[al]." Anthropic further objects to this Request as vague including because Plaintiffs have not defined the terms "chooses," "content," "clean," "filter," and "remove." Anthropic also objects to this Request as vague and ambiguous to the extent that Plaintiffs fail to explain what it means for "Anthropic" as an entity to "choose" anything, including "what content to clean, filter, or remove from the Training Corpus for its Claude AI Models." Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic additionally objects that this Request improperly seeks discovery of information that is more appropriately obtained through an interrogatory or deposition.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it cleans and processes the data used to train its models to remove data that would detract from the goal of teaching Claude to generate high quality text. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 81:

Admit that Anthropic does not have a written policy for cleaning, filtering, or removing copyrighted works from the Training Corpus used to train its Claude AI Models.

RESPONSE TO ADMISSION NO. 81:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague with because Plaintiffs have not defined the terms "written policy," "cleaning," "filtering," and "removing." Anthropic objects to this Request as compound because it seeks a Response to three distinct questions regarding three different "written polic[ies]" – one each for "clean[ing]," "filter[ing]," and "remov[al]" of copyrighted works. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court

(Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of this Request, Anthropic the term "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it does not have a written policy that specifically addresses "cleaning, filtering, or removing copyrighted works" from the datasets used to train its Claude AI Models. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 82:

Admit that it is technically feasible for Anthropic to remove copyrighted works from the Training Corpus used to train its Claude AI Models.

RESPONSE TO ADMISSION NO. 82:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague including because Plaintiffs have not defined the terms "technically feasible," "remove," and "copyrighted works." Anthropic objects to this Request to the extent it purports to ask Anthropic to speculate regarding what could be "technically feasible, no matter how infeasible, unrealistic, impractical, or cost or resource-prohibitive. Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of this Request, Anthropic the term "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic additionally objects that this Request improperly seeks discovery of information that is more appropriately obtained through an interrogatory or deposition. Anthropic further object to this

Request on grounds that such information is duplicative of discovery that has already been served, including its Responses to Interrogatory 9, which it incorporates by reference.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that in certain cases, it may be technically feasible to exclude specific data from new training runs that have not commenced. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 83:

Admit that Anthropic removed the lyrics from Publishers' Works from the Training Corpus for Claude AI Models after the commencement of this Litigation.

RESPONSE TO ADMISSION NO. 83:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic further objects to this Request as vague including because Plaintiffs have not defined the term "removed." Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic objects to this Request to the extent that it assumes that "the lyrics from Publishers' Works" were in "the Training Corpus for Claude AI Models" at any point in time. Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of this Request, Anthropic the term "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic also objects to this Request as unduly burdensome to the extent that it would require Anthropic to explore all of the training datasets Anthropic has used to train its Claude AI Models in their entirety to determine whether any lyrics from any one of the works listed in Dkt. 337, Exhibit A, might exist in some form within those datasets. Anthropic also objects to this Request as compound and unduly

burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that after Plaintiffs filed this lawsuit, Anthropic implemented additional guardrails and improved the ones already in place to help further ensure that Plaintiffs' works do not appear in Claude's outputs. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 84:

Admit that Anthropic has removed copyright notices from the Training Corpus it uses to train the Claude AI Models.

RESPONSE TO ADMISSION NO. 84:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs do not define the terms "removed," "train," or "copyright notices." Anthropic also objects to this Request as unduly burdensome to the extent that it would require Anthropic to explore all of the datasets Anthropic has used to train its Claude AI Models in their entirety to determine whether any "copyright notices" might have existed in some form within and were then subsequently removed from those datasets. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of this Request, Anthropic the term "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it cleans and processes the data used to train its models to remove data

that would detract from the goal of teaching Claude to generate high quality text. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 85:

Admit that Anthropic has removed copyright notices from Publishers' Works while training its Claude AI Models.

RESPONSE TO ADMISSION NO. 85:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to the definition "Works" or "Publishers' Works" as vague and ambiguous to the extent it refers to "musical compositions, including their lyrics, that are listed in Exhibit A to the Complaint, Dkt. 337-2, because Plaintiffs have represented that they may seek to amend this list, and because Exhibit A to the Complaint Dkt. 337-1, not Dkt. 337-2. For purposes of these Requests, Anthropic will construe "Works" or "Publishers' Works" to refer to the musical compositions, including their lyrics, listed in Exhibit A to the Complaint at Dkt. 337-1 and only those musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1. To the extent that Plaintiffs amend or change the definition of "Works" or "Publishers' Works," as used in these Requests, or amend the musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1, Anthropic reserves all rights, including to supplement or amend its Responses Anthropic further objects to this Request as vague, including because Plaintiffs do not define the terms "removed," "while training," or "copyright notices." Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it cleans and processes the data used to train its models to remove data

that would detract from the goal of teaching Claude to generate high quality text. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 86:

Admit that, in response to requests from third-party users, Claude has generated output containing the lyrics to one or more of Publishers' Works.

RESPONSE TO ADMISSION NO. 86:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "third-party users," "requests," "generated," or "output." For the sole purpose of responding to this Request for Admission, Anthropic will interpret "requests" as a prompt input into a publicly-available version of a Claude AI Model and "output" as the information shown to a user by a Claude AI Model in response to a prompt. Anthropic objects to the definition "Works" or "Publishers' Works" as vague and ambiguous to the extent it refers to "musical compositions, including their lyrics, that are listed in Exhibit A to the Complaint, Dkt. 337-2, because Plaintiffs have represented that they may seek to amend this list, and because Exhibit A to the Complaint is Dkt. 337-1, not Dkt. 337-2. For purposes of these Requests, Anthropic will construe "Works" or "Publishers' Works" to refer to the musical compositions, including their lyrics, listed in Exhibit A to the Complaint at Dkt. 337-1 and only those musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1. To the extent that Plaintiffs amend or change the definition of "Works" or "Publishers' Works," as used in these Requests, or amend the musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1, Anthropic reserves all rights, including to supplement or amend its Responses Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not

limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple works in a single Request and to the extent that it would require Anthropic to have knowledge of every instance of every output to every third-party request, without limitation.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that Claude has generated outputs containing at least partial lyrics for at least one of Publishers' works. Anthropic does not have sufficient information at this time to admit or deny whether the outputs were requested by third parties. Therefore, denied.

REQUEST FOR ADMISSION NO. 87:

Admit that, in response to requests from one or more third-party users, Claude has generated output containing the lyrics to a specific song.

RESPONSE TO ADMISSION NO. 87:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "third-party users," "requests," "generated," "output," or "a specific song." For the sole purpose of responding to this Request for Admission, Anthropic will interpret "requests" as a prompt input into a publicly-available version of a Claude AI Model and "output" to be the response that a user receives after entering a prompt into a Claude AI Model. Anthropic objects to the term "the lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic objects to this Request on the grounds that it seeks information about songs other than "Publishers' Works," as Anthropic has defined the term above. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the

extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273). Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple third-party users in a single Request and to the extent that it would require Anthropic to have knowledge of every instance of every output to every third-party request, without limitation.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that Claude has generated outputs containing at least partial lyrics. Anthropic does not have sufficient information at this time to admit or deny whether the outputs were requested by third parties. Therefore, denied.

REQUEST FOR ADMISSION NO. 88:

Admit that, in response to requests from one or more third-party users, Claude has generated output containing lyrics written by a specific artist or songwriter.

RESPONSE TO ADMISSION NO. 88:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "third-party users," "requests," "generated," or "output." Anthropic also objects to this Request as vague because Plaintiffs have not defined the phrase "a specific artist or songwriter." For the sole purpose of responding to this Request, Anthropic will interpret "requests" as a prompt input into a publicly-available version of a Claude AI Model and "output" to be the response that a user receives after entering a prompt into a Claude AI Model. Anthropic objects to the term "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic objects to this Request on the grounds that it seeks information about songs other than

"Publishers' Works," as Anthropic has defined the term above. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple third-party users in a single Request and to the extent that it would require Anthropic to have knowledge of every instance of every output to every third party request, without limitation.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that Claude has generated outputs containing at least partial lyrics. Anthropic does not have sufficient information at this time to admit or deny whether the outputs were requested by third parties. Therefore, denied.

REQUEST FOR ADMISSION NO. 89:

Admit that, in response to requests from one or more third-party users, Claude may generate output containing new song lyrics.

RESPONSE TO ADMISSION NO. 89:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects to this Request to the extent that the Request presents a hypothetical scenario. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "requests," "third-party users," "generate," "new," or "output." Anthropic also objects to this Request as vague and ambiguous to the extent it seeks information regarding output in response to "one or more third-party users." Anthropic objects to the term "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. For the sole purpose of responding to this Request, Anthropic will interpret "requests" as a prompt input into a publicly-available version of a Claude AI Model and "new" to mean "novel." Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation.

Anthropic additionally objects on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple third-party users in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that a generative AI model like Claude is designed and intended to respond as an intelligent human would to a vast array of user prompts, which may include generating new song lyrics in response to a user's prompt. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 90:

Admit that, in response to requests from one or more third-party users, Claude may generate output containing new song lyrics that are adapted from pre-existing song lyrics.

RESPONSE TO ADMISSION NO. 90:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "third-party users," "requests," "generate," "new," "output," "adapted," or "pre-existing." Anthropic also objects to this Request as vague and ambiguous because Plaintiffs have not defined the phrases "requests from one or more third-party users" or "adapted from pre-existing song lyrics" which could be reasonably interpreted in various ways. For the sole purpose of responding to this Request, Anthropic will interpret "requests" as prompts input into a publicly-available version of a Claude AI Model and "new" to mean "novel." Anthropic objects to the term "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation.

Anthropic additionally objects to this Request as not proportional to the needs of this litigation, which is limited to questions regarding the 499 works-in-suit as described by plaintiffs in Dkt. 337-1. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple third-party users in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that a generative AI model like Claude is designed and intended to respond as an intelligent human would to a vast array of user prompts, which may include generating new song lyrics in response to a user's prompt. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 91:

Admit that, in response to requests from one or more third-party users, Claude has generated output containing new song lyrics in the style of a specific artist or songwriter.

RESPONSE TO ADMISSION NO. 91:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "third-party users," "requests," "generated," "new," "output," "in the style of," "artist," or "songwriter." Anthropic also objects to this Request as vague and ambiguous because Plaintiffs have not defined the phrase "requests from one or more third-party users" which could be reasonably interpreted in various ways. Anthropic objects to the term "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. For the sole purpose of responding to this Request, Anthropic will interpret "requests" as prompts input into a publicly-available version of a Claude AI Model and "new" to mean "novel." Anthropic objects to this Request on the grounds that it seeks information about songs other than "Publishers' Works," as Anthropic has defined the term above. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not

limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as compound and unduly burdensome to the extent that it asks Anthropic to provide information about multiple third-party users in a single Request.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that a generative AI model like Claude is designed and intended to respond as an intelligent human would to a vast array of user prompts, which may include generating new song lyrics in response to a user's prompt. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 92:

Admit that Anthropic collects and analyzes Claude prompts and corresponding outputs to understand how Claude is used.

RESPONSE TO ADMISSION NO. 92:

Anthropic incorporates its general objections in its Response to this Request. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "collects," "analyzes," "prompts," "corresponding outputs," "understand," and "how Claude is used." Anthropic also objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding information that Anthropic "collects and analyzes" regarding Claude use cases, which is not at-issue in this case or relevant to any of Plaintiffs' claims or defenses.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that, at a high level, Anthropic may occasionally do internal analysis to understand how Claude is used, including through its "Claude insights and observations" ("Clio") platform, which may include analysis of user prompts and corresponding outputs. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 93:

Admit that Anthropic has implemented technological measures to prevent certain Claude outputs.

RESPONSE TO ADMISSION NO. 93:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "implemented," "technological measures," and "prevent." Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatory No. 12, which it incorporates by reference.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it has implemented certain technological systems intended to help prevent the generation of certain outputs, including but not limited to outputs that may infringe copyrights. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 94:

Admit that Anthropic can alter the technological measures implemented to prevent certain Claude outputs.

RESPONSE TO ADMISSION NO. 94:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "alter," "implemented," "the technological measures," and "prevent." Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt.

273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects that this Request is cumulative and duplicative of Request No. 93. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatory No. 12, which it incorporates by reference.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it has implemented certain technological systems intended to help prevent the generation of certain outputs, including but not limited to outputs that may infringe copyrights. Anthropic admits that it has periodically altered and iterated upon those systems and continues to make improvements. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 95:

Admit that Anthropic periodically alters the technological measures implemented to prevent certain Claude outputs.

RESPONSE TO ADMISSION NO. 95:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "periodically," "alters," "implemented," "technological measures," and "prevent." Anthropic further objects to the Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects that this Request is cumulative and duplicative of Request Nos. 93 and 94.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it has implemented certain technological systems intended to help prevent the generation of certain outputs, including but not limited to outputs that may infringe copyrights. Anthropic admits that it has periodically altered and iterated upon those systems and continues to make improvements. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 96:

Admit that Anthropic has implemented technological measures to alter certain Claude outputs.

RESPONSE TO ADMISSION NO. 96:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "implemented," "technological measures," and "alter." Anthropic objects to the term "outputs" as vague and ambiguous because Plaintiffs have not defined this term. For purposes of responding to this Request, Anthropic interprets "output" to be the response that a user receives after entering a prompt into the Claude AI Model. Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects that this Request is cumulative and duplicative of Request Nos. 93 through 95.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 97:

Admit that Anthropic controls the technological measures implemented to alter certain Claude outputs.

RESPONSE TO ADMISSION NO. 97:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms

"controls," "implemented." "technological measures," "alter," or "outputs." Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 98:

Admit that Anthropic periodically alters the technological measures implemented to alter certain Claude outputs.

RESPONSE TO ADMISSION NO. 98:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "periodically," "alter(s)," "implemented," and "technological measures." Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects that this Request is cumulative and duplicative of Request Nos. 93 through 95 and 97.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 99:

Admit that Anthropic never implemented technological measures to prevent Claude 1 from generating output that contains copyrighted lyrics.

RESPONSE TO ADMISSION NO. 99:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "implemented," "technological measures," "prevent," "generating," "output," "contains," or "copyrighted lyrics." Anthropic additionally objects to the phrase "contains copyrighted lyrics" as vague because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. Anthropic additionally objects to this Request as unduly burdensome to the extent that it asks Anthropic to provide information about an unlimited number of works in a single Request. Anthropic also objects to this Request insofar as it calls for a legal conclusion. Anthropic further objects on grounds that such information is and has already been made available to Publishers or is duplicative of discovery that has already been served, including its Responses to Interrogatory Nos. 12 and 14, which it incorporates by reference.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 100:

Admit that Anthropic never implemented technological measures to prevent Claude 2 from generating output that contains copyrighted lyrics.

RESPONSE TO ADMISSION NO. 100:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, including because Plaintiffs have not defined the terms "implemented," "technological measures," "prevent," "generating," "output," "contains," or "copyrighted lyrics." Anthropic additionally objects to the phrase "contains copyrighted lyrics" as vague because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. Anthropic additionally objects to this Request as unduly burdensome to the extent that it asks Anthropic to provide information about an unlimited number of works in a single Request. Anthropic also objects to this Request insofar as it calls for a legal conclusion.

Subject to and without waiving the foregoing Specific Objections and General Objections,

Anthropic responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 101:

Admit that the technological measures Anthropic used to prevent the output of copyrighted lyrics before October 1, 2023, failed to prevent Claude from repeatedly generating output containing copyrighted lyrics.

RESPONSE TO ADMISSION NO. 101:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "the technological measures," "output," "copyrighted lyrics," "failed to prevent," "repeatedly," or "generating." Anthropic further objects to this Request as unduly burdensome insofar as it would require Anthropic to identify every instance, if any such instances existed, in which one or more of its Claude AI models had produced some output containing some unspecified amount of copyrighted lyrics. Anthropic also objects to this Request as overbroad because Plaintiffs appear to request information about copyrighted lyrics in any quantity, regardless of whether those quantities would constitute infringement. Anthropic additionally objects to the phrase "containing copyrighted lyrics" as vague because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. Anthropic additionally objects to this Request as unduly burdensome to the extent that it asks Anthropic to provide information about an unlimited number of works in a single Request. Anthropic also objects to this Request insofar as it calls for a legal conclusion regarding which works are copyrighted. Anthropic further objects to this Request to the extent it asks Anthropic to provide a Response to prove a negative insofar as the Request seeks information regarding how many times certain events were prevented. Anthropic additionally objects to this Request as not proportional to the needs of this litigation, which is limited to questions regarding the 499 works-in-suit as described by plaintiffs in Dkt. 337-1.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Publishers have not identified evidence of Claude "repeatedly generating output containing copyrighted lyrics" prior to October 1, 2023. Therefore, denied.

REQUEST FOR ADMISSION NO. 102:

Admit that the technological measures Anthropic used to prevent the output of copyrighted lyrics before November 11, 2023, failed to prevent Claude from repeatedly generating output containing copyrighted lyrics.

RESPONSE TO ADMISSION NO. 102:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "technological measures," "prevent," "output," "copyrighted lyrics," "failed," "repeatedly," and "generating." Anthropic further objects to this Request as unduly burdensome insofar as it would require Anthropic to identify every instance, if any such instances existed, in which one or more of its Claude AI models had "repeatedly" inadvertently produced some output containing some unspecified amount of copyrighted lyrics. Anthropic also objects to this Request as overbroad because Plaintiffs appear to request information about copyrighted lyrics in any quantity, regardless of whether those quantities would constitute infringement. Anthropic additionally objects to the phrase "containing copyrighted lyrics" as vague because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. Anthropic additionally objects to this Request as unduly burdensome to the extent that it asks Anthropic to provide information about an unlimited number of works in a single Request. Anthropic also objects to this Request insofar as it calls for a legal conclusion regarding which works are copyrighted. Anthropic further objects to this Request to the extent it asks Anthropic to provide a Response to prove a negative insofar as the Request seeks information regarding how many times certain events were prevented. Anthropic additionally objects to this Request as not proportional to the needs of this litigation, which is limited to questions regarding the 499 works-in-suit as described by plaintiffs in Dkt. 337-1.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic incorporates its Responses and Objections to Request Nos. 99 through 101. Anthropic denies that the guardrails it had implemented prior to November 11, 2023 "failed to prevent Claude from repeatedly generating output containing copyrighted lyrics." Publishers have not identified evidence of Claude "repeatedly generating output containing copyrighted lyrics" prior to November 11, 2023. Therefore, denied.

REQUEST FOR ADMISSION NO. 103:

Admit that the technological measures Anthropic used to prevent the output of copyrighted lyrics before June 1, 2024, failed to prevent Claude from repeatedly generating output containing copyrighted lyrics in all known instances.

RESPONSE TO ADMISSION NO. 103:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "technological measures," "used," "prevent," "output," "copyrighted lyrics," "failed," "repeatedly," "generating," or "in all known instances." Anthropic further objects to this Request as unduly burdensome insofar as it would require Anthropic to identify every instance, if any such instances existed, in which one or more of its Claude AI models had "repeatedly" inadvertently produced some output containing some unspecified amount of copyrighted lyrics. Anthropic also objects to this Request as overbroad because Plaintiffs appear to request information about copyrighted lyrics in any quantity, regardless of whether those quantities would constitute infringement. Anthropic additionally objects to the phrase "containing copyrighted lyrics" as vague because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. Anthropic additionally objects to this Request as unduly burdensome to the extent that it asks Anthropic to provide information about an unlimited number of works in a single Request. Anthropic also objects to this Request insofar as it calls for a legal conclusion regarding which works are copyrighted. Anthropic further objects to this Request to the extent it asks Anthropic to provide a Response to prove a negative insofar as the Request seeks information regarding how many times certain events were prevented. Anthropic additionally objects to this Request as not proportional to the needs of this

litigation, which is limited to questions regarding the 499 works-in-suit as described by plaintiffs in Dkt. 337-1.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Publishers have not identified evidence of Claude "repeatedly generating output containing copyrighted lyrics" prior to June 1, 2024. Therefore, denied.

REQUEST FOR ADMISSION NO. 104:

Admit that the technological measures Anthropic used to prevent the output of copyrighted lyrics before January 1, 2025, failed to prevent Claude from repeatedly generating output containing copyrighted lyrics in all known instances.

RESPONSE TO ADMISSION NO. 104:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "technological measures," "used," "prevent," "output," "copyrighted lyrics," "repeatedly," "generating," or "in all known instances." Anthropic further objects to this Request as unduly burdensome insofar as it would require Anthropic to identify every instance, if any such instances existed, in which one or more of its Claude AI models had "repeatedly" inadvertently produced some output containing some unspecified amount of copyrighted lyrics. Anthropic also objects to this Request as overbroad because Plaintiffs appear to request information about copyrighted lyrics in any quantity, regardless of whether those quantities would constitute infringement. Anthropic additionally objects to the phrase "containing copyrighted lyrics" as vague because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. Anthropic additionally objects to this Request as unduly burdensome to the extent that it asks Anthropic to provide information about an unlimited number of works in a single Request. Anthropic also objects to this Request insofar as it calls for a legal conclusion regarding which works are copyrighted. Anthropic further objects to this Request to the extent it asks Anthropic to provide a Response to prove a negative insofar as the Request seeks information regarding how many times certain events were prevented. Anthropic additionally objects to this Request as not proportional to the needs of this

litigation, which is limited to questions regarding the 499 works-in-suit as described by plaintiffs in Dkt. 337-1.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Publishers have not identified evidence of Claude "repeatedly generating output containing copyrighted lyrics" prior to January 1, 2025. Therefore, denied.

REQUEST FOR ADMISSION NO. 105:

Admit that the technological measures Anthropic currently implements to prevent the output of copyrighted lyrics do not prevent Claude from repeatedly generating output that contains copyrighted lyrics in some instances.

RESPONSE TO ADMISSION NO. 105:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "technological measures," "currently," "implements," "prevent," "output," "copyrighted lyrics," "repeatedly," "generating," or "in some instances." Anthropic further objects to this Request as unduly burdensome insofar as it would require Anthropic to identify every instance, if any such instances existed, in which one or more of its Claude AI models had "repeatedly" inadvertently produced some output containing some unspecified amount of copyrighted lyrics. Anthropic additionally objects to the phrase "copyrighted lyrics" as vague because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. Anthropic additionally objects to this Request as unduly burdensome to the extent that it asks Anthropic to provide information about an unlimited number of works in a single Request and to the extent that it would require Anthropic to have knowledge of every instance of every output, without limitation. Anthropic also objects to this Request insofar as it calls for a legal conclusion regarding which works are copyrighted. Anthropic further objects to this Request to the extent it asks Anthropic to provide a Response to prove a negative insofar as the Request seeks information regarding how many times certain events are prevented. Anthropic additionally objects to this Request as not

proportional to the needs of this litigation, which is limited to questions regarding the 499 works-in-suit as described by plaintiffs in Dkt. 337-1.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Publishers have not identified evidence of Claude "repeatedly generating output that contains copyrighted lyrics." Therefore, denied.

REQUEST FOR ADMISSION NO. 106:

Admit that the technological measures Anthropic currently implements to prevent the output of copyrighted lyrics do not prevent Claude from repeatedly generating output of new song lyrics.

RESPONSE TO ADMISSION NO. 106:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "technological measures," "currently," "implements," "prevent," "output," "copyrighted lyrics," "failed," "repeatedly," "generating," or "new." Anthropic further objects to this Request as unduly burdensome insofar as it would require Anthropic to identify every instance, if any such instances existed, in which one or more of its Claude AI models had "repeatedly" inadvertently produced some output containing "new" song lyrics. For the sole purpose of responding to this Request, Anthropic will interpret "new" to mean "novel." Anthropic additionally objects to the phrase "copyrighted lyrics" as vague because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. To the extent that Plaintiffs request information about the Claude AI Models' ability to output novel lyrics, Anthropic objects to this Request as not proportional to the needs of this litigation, which is limited to questions regarding the 499 works-in-suit as described by plaintiffs in Dkt. 337-1. Anthropic additionally objects to this Request as unduly burdensome to the extent that it asks Anthropic to provide information about an unlimited number of works in a single Request and to the extent that it would require Anthropic to have knowledge of every instance of every output, without limitation. Anthropic further objects to this Request to the extent it asks Anthropic to provide a Response to prove a negative insofar as the Request seeks information regarding how many times certain events are prevented.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Publishers have not identified evidence of Claude "repeatedly generating output of new song lyrics." Therefore, denied.

REQUEST FOR ADMISSION NO. 107:

Admit that Anthropic collects and analyzes Claude prompts and corresponding outputs to identify user attempts to bypass technological measures implemented by Anthropic to prevent the output of copyrighted lyrics.

RESPONSE TO ADMISSION NO. 107:

Anthropic incorporates its general objections in its Response to this Request. Anthropic incorporates its general objections in its Response to this Request. Anthropic objects further on the ground that a Response to this Request is better sought through other means of discovery, including document productions, including those already served, deposition testimony, or Interrogatory Responses. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "collects," "analyzes," "prompts," "output(s)," "user," "attempts," "bypass," "technological measures," "implemented," "prevent," or "copyrighted lyrics." Anthropic additionally objects to the phrase "copyrighted lyrics" as vague because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. Anthropic also objects that this Request is vague because Plaintiffs do not specify whether they are seeking information about Anthropic's analysis or collection of prompts and corresponding outputs in the context of this litigation or more generally. For the sole purpose of responding to this Request, Anthropic will interpret this Request as asking about Anthropic's "collect[ions] and analy[ses]" in the ordinary course of its business. Anthropic also objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding information that Anthropic "collects and analyzes" regarding third party actions, which is not at-issue in this case or relevant to any of Plaintiffs' claims or defenses.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Denied.

REQUEST FOR ADMISSION NO. 108:

Admit that Anthropic has identified specific instances when users have successfully bypassed the technological measures Anthropic implemented to prevent the output of copyrighted lyrics.

RESPONSE TO ADMISSION NO. 108:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "specific," "instances," "users," "successfully bypassed," "technological measures," "implemented," "prevent," "output," or "copyrighted lyrics." Anthropic also objects that this Request is vague because Plaintiffs do not specify whether they are seeking information about instances where users have bypassed Anthropic's guardrails related to copyrighted lyrics in the context of this litigation or more generally. Anthropic additionally objects to the phrase "copyrighted lyrics" as vague because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. For the sole purpose of responding to this Request, Anthropic will interpret this Request as asking about Anthropic's knowledge of specific instances in which users have successfully bypassed the guardrails in its Claude AI Models designed to prevent the output of copyrighted lyrics in the ordinary course of its business. Anthropic objects to this Request to the extent it seeks information not in Anthropic's custody or control. Anthropic further objects to this Request to the extent that it seeks third party information.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Apart from attempts by Publishers' own agents, Publishers have not identified evidence of instances in which users have deliberately sought to bypass its guardrails designed to prevent the output of copyrighted lyrics and succeeded in doing so. Therefore, denied.

REQUEST FOR ADMISSION NO. 109:

Admit that Anthropic has identified specific instances when users have successfully bypassed the technological measures Anthropic implemented to prevent the output of lyrics to Publishers' Works.

RESPONSE TO ADMISSION NO. 109:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "specific," "instances," "users," "successfully bypassed," "technological measures," "implemented," "prevent," "output," or "lyrics." Anthropic also objects that this Request is vague because Plaintiffs do not specify whether they are seeking information about instances where users have bypassed Anthropic's guardrails related to the lyrics to Publishers' Works in the context of this litigation or more generally. Anthropic objects to the term "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics or some partial number of lyrics and in what quantity. For the sole purpose of responding to this Request, Anthropic will interpret this Request as asking about Anthropic's knowledge of specific instances in which users have successfully bypassed the guardrails in its Claude AI Models designed to prevent the output of the lyrics to Publishers' Works in the ordinary course of its business. Anthropic objects to this Request to the extent that it seeks third party information.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Apart from attempts by Publishers' own agents, Publishers have not identified evidence of instances in which users have deliberately sought to bypass its guardrails designed to prevent the output of the lyrics to Publishers' Works and been successful in doing so. Therefore, denied.

REQUEST FOR ADMISSION NO. 110:

Admit that Anthropic does not have an express license to use any song lyrics contained in the Training Corpus used to train the Claude AI Models.

RESPONSE TO ADMISSION NO. 110:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "express license to use any song lyrics contained in the Training Corpus." Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic additionally objects to the phrase "any song lyrics" as vague and ambiguous. Anthropic further objects to the phrase "any song lyrics" to the extent the phrase seeks information relating to songs beyond those listed by Plaintiffs in Dkt. 337-1. For purposes of responding to this Request, Anthropic interprets "any song lyrics" to mean the lyrics to at least one song that is contained in the Training Corpus. Anthropic objects to this Request to the extent that it seeks third party information. Anthropic further objects to this Request on the grounds that the term "Training Corpus" is vague and ambiguous. For purposes of responding to this Request, Anthropic understands the phrase "Training Corpus" to mean the collection of materials used to pre-train Claude, as defined by the Court's November 26, 2024 Order.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it does not have an express license to use any song lyrics contained in the Training Corpus for training the Claude AI Models. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 111:

Admit that Anthropic has never sought an express license from any third party to use their song lyrics for any purpose.

RESPONSE TO ADMISSION NO. 111:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "never," "sought," "express license," "third party," "use," "their," "song lyrics," "any," or "purpose." Anthropic additionally objects to the phrase "song lyrics" as vague because Plaintiffs have not

specified whether they mean full lyrics to a song or some partial number of lyrics and in what quantity. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic objects to this Request to the extent that it seeks third party information. Anthropic also objects to this Request as beyond the scope and not proportional to the claims or defenses of this litigation to the extent that it seeks information about licenses "sought" by Anthropic to use song lyrics "for any purpose."

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Admitted.

REQUEST FOR ADMISSION NO. 112:

Admit that Anthropic has never secured a license from any third party to use their song lyrics for any purpose.

RESPONSE TO ADMISSION NO. 112:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "never," "secured," "license," "third party," "use," "their," "song lyrics," "any," or "purpose." Anthropic additionally objects to the phrase "song lyrics" as vague because Plaintiffs have not specified whether they mean full lyrics to a song or some partial number of lyrics and in what quantity. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. For the sole purpose of responding to this Request, Anthropic will interpret "their song lyrics" to mean content including song lyrics which a party represented to Anthropic it had all of the necessary rights to for the purpose of granting certain rights, including licenses, to Anthropic.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Admitted.

REQUEST FOR ADMISSION NO. 113:

Admit that Anthropic does not pay any third party to use their song lyrics for any purpose.

RESPONSE TO ADMISSION NO. 113:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "pay," "third party," "use," "their," "song lyrics," "any," or "purpose." Anthropic additionally objects to the phrase "song lyrics" as vague because Plaintiffs have not specified whether they mean full lyrics to a song or some partial number of lyrics and in what quantity. For the sole purpose of responding to this Request, Anthropic will interpret "their song lyrics" to mean content including song lyrics which a party represented to Anthropic it had all of the necessary rights to for the purpose of granting certain rights, including licenses, to Anthropic.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Admitted.

REQUEST FOR ADMISSION NO. 114:

Admit that Anthropic receives revenue from Claude Pro customers.

RESPONSE TO ADMISSION NO. 114:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "receives revenue," and "Claude Pro customers."

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that Claude Pro customers pay to use Anthropic's Claude services.

REQUEST FOR ADMISSION NO. 115:

Admit that Anthropic receives payments on a per million input tokens basis from Claude API customers that request lyrics to Publishers' Works as output from its Claude AI Models.

RESPONSE TO ADMISSION NO. 115:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "receives," "payments," "per million input tokens basis," "Claude API customers," "request," "lyrics," or

"output." Anthropic objects to the definition "Works" or "Publishers' Works" as vague and ambiguous to the extent it refers to "musical compositions, including their lyrics, that are listed in Exhibit A to the Complaint, ECF No. 337-2, because Plaintiffs have represented that they may seek to amend this list, and because Exhibit A to the Complaint is ECF No. 337-1, not ECF No. 337-2. For purposes of these Requests, Anthropic will construe "Works" or "Publishers' Works" to refer to the musical compositions, including their lyrics, listed in Exhibit A to the Complaint at ECF No. 337-1 and only those musical compositions listed in Exhibit A to the Complaint at ECF No. 337-1. To the extent that Plaintiffs amend or change the definition of "Works" or "Publishers' Works," as used in these Requests, or amend the musical compositions listed in Exhibit A to the Complaint at ECF No. 337-1, Anthropic reserves all rights, including to supplement or amend its Responses. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as unduly burdensome to the extent that it asks Anthropic to provide information about an unreasonably large number of accounts and at least hundreds of works in a single Request. For the sole purpose of responding to this Request, Anthropic will interpret the phrase "receives payments" as the prices Anthropic charges to its customers.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that one way customers pay for Anthropic's API services is on a price-per-million tokens input pricing basis. Anthropic does not have sufficient information at this time to admit or deny whether any Claude API customers have attempted to prompt Anthropic's Claude AI Models to generate one or more outputs containing full or partial song lyrics for the songs listed

in Dkt. 337-1, and therefore denies.

REQUEST FOR ADMISSION NO. 116:

Admit that Anthropic receives payments on a per million output tokens basis from Claude API customers that receive lyrics to Publishers' Works as output from its Claude AI Models.

RESPONSE TO ADMISSION NO. 116:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms "receive(s)," "payments," "per million input tokens basis," "Clause API customers," "lyrics," or "output." Anthropic objects to the definition "Works" or "Publishers' Works" as vague and ambiguous to the extent it refers to "musical compositions, including their lyrics, that are listed in Exhibit A to the Complaint, Dkt. 337-2, because Plaintiffs have represented that they may seek to amend this list, and because Exhibit A to the Complaint is Dkt. 337-1, not Dkt. 337-2. For purposes of these Requests, Anthropic will construe "Works" or "Publishers' Works" to refer to the musical compositions, including their lyrics, listed in Exhibit A to the Complaint at Dkt. 337-1 and only those musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1. To the extent that Plaintiffs amend or change the definition of "Works" or "Publishers' Works," as used in these Requests, or amend the musical compositions listed in Exhibit A to the Complaint at Dkt. 337-1, Anthropic reserves all rights, including to supplement or amend its Responses. Anthropic objects to the terms "lyrics" as vague and ambiguous because Plaintiffs have not specified whether they mean the full lyrics of the "Publishers' Works," as Anthropic has defined the term above, or some partial number of lyrics and in what quantity. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information relating to AI models other than Claude, as defined by the Court (Dkt. 273), or versions of Claude for which pre-training began after November 26, 2024. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic also objects to this Request as unduly burdensome to the extent that it asks Anthropic to provide information about an unreasonably large number of accounts and at least hundreds of works

in a single Request. For the sole purpose of responding to this Request, Anthropic will interpret the phrase "receives payments" as the prices Anthropic charges to its customers.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that one way customers pay for Anthropic's API services is on a price-per-million tokens output pricing basis. Anthropic does not have sufficient information at this time to admit or deny whether any Claude API customers have received one or more outputs generated by Anthropic's Claude AI Models containing full or partial song lyrics for the songs listed in Dkt. 337-1 and therefore denies.

REQUEST FOR ADMISSION NO. 117:

Admit that Anthropic has permanently removed certain artist songwriter names from its Claude prompt and output records via the application of Google DLP.

RESPONSE TO ADMISSION NO. 117:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms and/or phrases "permanently removed," "certain," "artist songwriter names," "prompt and output records," or "application of Google DLP." Anthropic also objects to this Request as unduly burdensome and not proportional to the needs of this case to the extent it seeks a Response regarding Google DLP, which is not at-issue in this case or relevant to any of Plaintiffs' claims or defenses. Anthropic additionally objects to this Request as unduly burdensome and not proportionate to the needs of this case, because it focuses not on the merits but is instead a Request for highly disfavored discovery on discovery. Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information unrelated to works-in-suit and asks Anthropic to distinguish undefined "artist songwriter names" from other names that may have appeared in prompt or output records. Anthropic also objects to this Request as vague and ambiguous to the extent that Plaintiffs fail to explain what it means for "Anthropic" as an entity to "remove" names from prompt and output records. Anthropic

further objects to this Request as unduly burdensome on the grounds that such information is duplicative of discovery that has already been produced, including in response to Plaintiffs' Requests for Production 95-98, which Anthropic incorporates by reference.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it has used Google DLP to protect user privacy. Google DLP is software that redacts personally identifiable information from Claude prompts and outputs, including person's names responsive to the "PERSON_NAME" field. Except as so expressly admitted, denied.

REQUEST FOR ADMISSION NO. 118:

Admit that Anthropic has permanently removed certain song title names from its Claude prompt and output records via the application of Google DLP.

RESPONSE TO ADMISSION NO. 118:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms and/or phrases "permanently removed," "certain," "song title names," "prompt and output records," or "application of Google DLP." Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information unrelated to works-in-suit and asks Anthropic to distinguish undefined "song title names" that may have appeared in prompt or output records. Anthropic additionally objects to this Request as unduly burdensome and not proportionate to the needs of this case, because it focuses not on the merits but is instead a Request for highly disfavored discovery on discovery. Anthropic further objects to this Request as unduly burdensome on the grounds that such information is duplicative of discovery that has already been produced, including in response to Plaintiffs' Requests for Production 95-98, which Anthropic incorporates by reference.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it uses Google DLP to protect user privacy. Google DLP is software that redacts personally identifiable information from Claude prompts and outputs, including names responsive to the "PERSON_NAME" field. Anthropic does not have sufficient information at this time to admit or deny whether any "song title names" were redacted. Therefore denied.

REQUEST FOR ADMISSION NO. 119:

Admit that Anthropic has permanently removed certain names contained in song lyrics to its Claude prompt and output records via the application of Google DLP.

RESPONSE TO ADMISSION NO. 119:

Anthropic incorporates its general objections in its Response to this Request. Anthropic further objects to this Request as vague, because Plaintiffs have not defined the terms and/or phrases "permanently removed," "certain," "names," "song lyrics," "prompt and output records," or "application of Google DLP." Anthropic further objects to this Request to the extent it is not reasonably limited in time or otherwise not limited to a timeframe relevant to this litigation. Anthropic objects to this Request as overbroad, unduly burdensome, and not proportional to the needs of this case to the extent it seeks information unrelated to works-in-suit and asks Anthropic to distinguish undefined "names contained in song lyrics" from other names that may have appeared in prompt or output records. Anthropic additionally objects to this Request as unduly burdensome and not proportionate to the needs of this case, because it focuses not on the merits but is instead a Request for highly disfavored discovery on discovery. Anthropic further objects to this Request as unduly burdensome on the grounds that such information is duplicative of discovery that has already been produced, including in response to Plaintiffs' Requests for Production 95-98, which Anthropic incorporates by reference.

Subject to and without waiving the foregoing Specific Objections and General Objections, Anthropic responds as follows:

Anthropic admits that it has used Google DLP to protect user privacy. Google DLP is software that redacts personally identifiable information from Claude prompts and outputs, including person's names responsive to the "PERSON_NAME" field. Except as so expressly admitted, denied.

Date: September 18, 2025

/s/ *Sonal N. Mehta*

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ANTHROPIC PBC

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2025 I did cause Defendant Anthropic PBC's Amended Responses and Objections to Plaintiffs' First Set of Requests For Admissions (Nos. 1-119) to be served on the following listed below and in the manner so indicated.

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Dated: September 18, 2025

By: */s/ Sonal N. Mehta*
Sonal N. Mehta