EXHIBIT 31

OPPENHEIM + ZEBRAK, LLP
Matthew J. Oppenheim
Nicholas C. Hailey
Jeffrey M. Gould
Corey Miller
Keith Howell
Audrey L. Adu-Appiah
(admitted *pro hac vice*)
4530 Wisconsin Ave., NW, 5th Floor
Washington, DC 20016
Telephone: (202) 480-2999
matt@oandzlaw.com
nick@oandzlaw.com
jeff@oandzlaw.com
corey@oandzlaw.com
khowell@oandzlaw.com
aadu-appiah@oandzlaw.com

Alexander Kaplan
Jennifer Pariser
Andrew Guerra
Bret Matera
Timothy Chung
Michelle Gomez-Reichman
(admitted *pro hac vice*)
461 5th Avenue, 19th Floor
New York, NY 10017
Telephone: (212) 951-1156
alex@oandzlaw.com
jpariser@oandzlaw.com
andrew@oandzlaw.com
bmatera@oandzlaw.com
tchung@oandzlaw.com
mgomez-reichman@oandzlaw.com

Attorneys for Plaintiffs

[Additional Counsel on signature page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case Number: 5:24-cv-03811-EKL-SVK

PLAINTIFFS' SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANT'S SECOND SET OF INTERROGATORIES

Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiffs Concord Music Group, Inc.; Capitol CMG, Inc.; Universal Music Corp., Songs of Universal, Inc., Universal Music – MGB NA LLC, Polygram Publishing, Inc., Universal Music – Z Tunes LLC (collectively, "UMPG"); and ABKCO Music, Inc. (collectively with UMPG, "Publishers") hereby respond through the undersigned counsel to Defendant Anthropic PBC's ("Anthropic") Second Set of Interrogatories ("Anthropic's Interrogatories") as follows:

PRELIMINARY STATEMENT

Each of Publishers' responses are subject to, and incorporate, the following statements and objections:

1. The following objections are incorporated into each of the following responses to these Interrogatories and shall be deemed continuing as to each Interrogatory and are not waived, or in any way limited, by subsequent objections and responses. Publishers reserve the right to assert additional objections to these Interrogatories as appropriate and to supplement these objections and responses. Plaintiffs may repeat an objection for emphasis in responses to individual Interrogatories, but the failure to repeat any objections does not waive any objection to the topic or Interrogatory.

2. Publishers will make reasonable efforts to respond to Anthropic's Interrogatories to the extent that no objection is made and as Publishers understand and interpret each Interrogatory. If Anthropic subsequently asserts any interpretation of any Interrogatory that differs from the interpretation of Publishers, Publishers reserve the right to supplement and amend their objections and responses. Publishers' objections and responses as set forth herein are made without prejudice to Publishers' right to assert any different, additional, or supplemental objections and responses as additional information becomes known to Publishers.

3. Publishers object to any Interrogatory that is premature and/or conflicts with any schedule for disclosure entered, or to be entered, by the Court.

4. Publishers object to any Definition, Instruction, or Interrogatory to the extent it is overbroad or unduly burdensome, or purports to impose upon Publishers any duty or obligation that is inconsistent with or in excess of those obligations that are imposed by the Federal Rules of

Civil Procedure (Fed. R. Civ. P.), the Local Rules of this Court, or any other applicable rule. Publishers also object to any Definition, Instruction, or Interrogatory to the extent it purports to impose a duty or obligation on Publishers to conduct a search for information beyond a reasonably diligent search of Publishers' corporate files where Documents responsive to these Interrogatories would reasonably be expected to be found.

5. Publishers object to any Interrogatory to the extent it would impose a duty on Publishers to undertake a search for information for which Anthropic is equally able to search.

6. Publishers object to any Interrogatory that seeks information protected from disclosure by the attorney-client privilege, the attorney work product doctrine, the joint prosecution or common interest privilege, the self-criticism privilege, the anti-piracy privilege, or any other applicable privilege or immunity. Publishers maintain that the details of their legal investigation constitute attorney opinion work product that is protected against disclosure. Fed. R. Civ. P. 26(b)(3)(B). Publishers provide the limited interrogatory responses herein solely because such responses were specifically ordered by the Court, and without waiver to the attorney work product protection that applies to all other information regarding their legal investigation. Publishers maintain their objections to disclosing any additional details regarding their legal investigation, on these work product protection grounds and the other grounds stated herein. The inadvertent production by Publishers of Documents containing information protected from disclosure by any such privilege or doctrine shall not constitute a waiver by Publishers of such protections.

7. Publishers object to any Interrogatory to the extent it is not limited in temporal scope. In responding to the Interrogatories, unless otherwise indicated, Publishers will limit their responses and will not furnish information from earlier than 2021.

8. Nothing contained herein is an admission relative to the existence of any information or Documents sought, to the relevance or admissibility of any response, or to the truth or accuracy of any statement or characterization contained in any particular Interrogatory.

9. Publishers' investigations are ongoing. Publishers' responses are based on information known and available to Publishers at this time. Publishers reserve the right to

supplement or amend their responses, as provided in the Federal Rules of Civil Procedure and the Local Rules of this Court.

OBJECTION TO SPECIFIC DEFINITIONS

10. Publishers object to Definition No. 2 on the basis that it is overbroad, unduly burdensome, and disproportionate to the needs of the case as required by Fed. R. Civ. P. 26(b)(1). Given the size and complexity of Publishers' corporate structures, the inclusion of ***all*** Publishers' "past or present, direct or indirect, subsidiaries, affiliates, divisions, business units, predecessors in interest, successors, divisions, Employees, Agents, and attorneys" would not only unreasonably expand Publishers' burden of collection and review, but would also purport to subject Third Parties not in possession, custody, or control of relevant information in this litigation (the "Litigation") to discovery. Publishers will interpret "Plaintiffs," "Publishers," "You," or "Your" to mean the entities identified in Publishers' Complaint and, if any, affiliates under their control identified by Publishers to be in possession, custody, or control of potentially relevant and non-duplicative Documents.

11. Publishers object to Definition No. 6 on the basis that it is vague and ambiguous to the extent the term "AI" is used independently of additional qualifying terms, since "artificial intelligence" alone can encompass, without limitation, any number of services, products, or things that relate to artificial intelligence, whether currently existing or not.

12. Publishers object to Definition No. 8 on the basis that it is overbroad, unduly burdensome, and disproportionate to the needs of the case as required by Fed. R. Civ. P. 26(b)(1) because the Definition, as worded, includes all compositions that Publishers "intend to assert a claim for copyright infringement in this Action." Although Publishers reserve the right to bring additional claims related to any of their musical compositions to which they own or control exclusive rights, Publishers cannot also be expected to search for and furnish information related to musical compositions that they may not have yet contemplated asserting claims for at this stage in the case and absent full discovery between the parties. Accordingly, Publishers will interpret "Asserted Works" or "Publishers' Asserted Works" to mean the musical compositions that are listed in Exhibit A of the First Amended Complaint, ECF No. 337-2, and any additional

compositions to which Publishers own or control exclusive rights listed in a subsequently amended complaint.

13. Publishers object to Definition No. 13 on the basis that it is overbroad, unduly burdensome, and disproportionate to the needs of the case as required by Fed. R. Civ. P. 26(b)(1) because the Definition, as worded, purports to include Documents beyond the scope of the issues in this Litigation, such as by seeking Documents or Things that are "in any way touching upon." Publishers will not comply with any Interrogatory to the extent it purports to require Documents or Things beyond the scope and obligations of Fed. R. Civ. P. 26(b)(1). Publishers will interpret the terms listed in Definition No. 13 to mean relating to, referring to, describing, evidencing or constituting or in any way relevant within the meaning of Fed. R. Civ. P. 26(b)(1).

14. Publishers object to Definition No. 14 on the basis that it is unduly burdensome and disproportionate to the needs of the case as required by Fed. R. Civ. P. 26(b)(1) because it purports to include persons or entities not within Publishers' control or employment, whether "active or retired . . . current or former." Publishers cannot compel production from persons or entities outside of their employment or control nor produce Documents outside their possession, custody, or control. Publishers will interpret "employee" to mean officer, employee, or partner of the designated entity, whether full-time or part-time, and compensated or not.

15. Publishers object to Definition No. 16 on the basis that it is unduly burdensome and disproportionate to the needs of the case as required by Fed. R. Civ. P. 26(b)(1) because it purports to require Publishers to furnish more information than is required under the Federal Rules or any other applicable rule. Publishers further object to Definition No. 16 on the basis that it seeks information outside of Publishers' possession, custody, or control. Accordingly, Publishers will interpret "identify," "identity," and "identification" to mean, as the context shall make appropriate:

a. With respect to a person, to the extent known, the person's full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment;

b. With respect to a Document, to the extent known, the type of Document, general subject matter, date of the Document, and author(s), addressee(s) and recipient(s);

c. With respect to a telephone conversation, to the extent known, the participants' full names, present or last known place of employment, present or last known address, the date of the conversation, and the subject matter discussed;

d. With respect to an oral conversation other than a telephone conversation, to the extent known, the participants' full names, present or last known place of employment, present or last known address, the date of the conversation, and the subject matter discussed;

e. With respect to a corporation, partnership, association, or other entity, to the extent known, its full name and present or last known address; and

f. With respect to any event or action, to the extent known, the dates or approximate dates thereof, a description of what occurred, and all identifiable persons involved.

OBJECTIONS TO SPECIFIC INSTRUCTIONS

16. Publishers object to Instruction No. 11 to the extent it requires Publishers to materially rewrite Anthropic's Interrogatories, Definitions, or Instructions to resolve any ambiguities or deficiencies in their construction.

17. Publishers object to Instruction No. 12 on the basis that it is overbroad, unduly burdensome, and disproportionate to the needs of the case as required by Fed. R. Civ. P. 26(b)(1) because the Instruction, as worded, purports to require Publishers to produce Documents or Things starting from an undefined point in time "through the present," which would constitute an ever-shifting timeline with no end for the purposes of Publishers' ESI custodial collections, searches, and productions. Publishers will interpret "the present" as March 22, 2024. Where agreed to and without foregoing their objections, Publishers will furnish information from no earlier than 2021 and through March 22, 2024, except in instances where Publishers become aware of responsive information dated after March 22, 2024.

SUPPLEMENTAL RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 3:

Identify the total number of prompts You and/or Your Agent(s) entered into Claude or Claude API requesting lyrics to songs and the total number of outputs received that included song lyrics before filing Your initial Complaint in this Action.

PUBLISHERS' SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 3:

Publishers incorporate their Preliminary Statement, Objections to Specific Definitions, and Objections to Specific Instructions as if fully asserted herein. Publishers object to this Interrogatory as overbroad, unduly burdensome, and disproportionate to the needs of this case as required by Fed. R. Civ. P. 26(b)(1) because it seeks information that is irrelevant to the issues in this Litigation, including the total number of prompts Publishers or Publishers' Agents entered into Claude or Claude API requesting lyrics to songs and the total number of outputs received that included song lyrics before filing the initial Complaint in this Action. Publishers further object to this Interrogatory as vague and ambiguous, including because the phrases "entered into" and "received" do not provide sufficient parameters for Publishers to provide an accurate response. Publishers further object to this Interrogatory on the basis that it purports to require Publishers to furnish information that is protected by the attorney-client privilege, work product privilege, or any other applicable privilege or immunity. Publishers maintain that the details of their legal investigation constitute attorney opinion work product that is protected against disclosure. Fed. R. Civ. P. 26(b)(3)(B). Publishers provide the limited interrogatory responses herein solely because such responses were specifically ordered by the Court, and without waiver to the attorney work product protection that applies to all other information regarding their legal investigation. Publishers maintain their objections to disclosing any additional details regarding their legal investigation, on these work product protection grounds and the other grounds stated herein.

Subject to Publishers' objections, in accordance with ECF No. 545, Publishers refer to their Jan. 9, 2026 Supplemental Response to Interrogatory No. 4 below.

INTERROGATORY NO. 4:

Identify the total number of times, prior to the filing of Your initial Complaint in this Action, that You prompted Claude or Claude API by requesting lyrics to songs and did not receive an output containing the requested lyrics, including without limitation any instances where You received a refusal due to Claude or Claude API's guardrails.

PUBLISHERS' APR. 13, 2026 SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 4:

Publishers incorporate their Preliminary Statement, Objections to Specific Definitions, and Objections to Specific Instructions as if fully asserted herein. Publishers object to this Interrogatory as overbroad, unduly burdensome, and disproportionate to the needs of this case as required by Fed. R. Civ. P. 26(b)(1) because it seeks information that is irrelevant to the issues in this Litigation, including the total number of times, prior to the filing of the initial Complaint in this Action, that Publishers prompted Claude or Claude API by requesting lyrics to songs and did not receive an output containing the requested lyrics. Publishers further object to this Interrogatory as vague and ambiguous, including because the phrases "requesting lyrics" or "requested lyrics" do not provide sufficient parameters for Publishers to provide an accurate response. For example, Claude may have generated lyrics as output to a prompt that did not seek copies of lyrics to a copyrighted work but nevertheless was construed by Claude to be a "request" for lyrics. Publishers further object to this Interrogatory on the basis that it purports to require Publishers to furnish information that is protected by the attorney-client privilege, work product privilege, or any other applicable privilege or immunity. Publishers maintain that the details of their legal investigation constitute attorney opinion work product that is protected against disclosure. Fed. R. Civ. P. 26(b)(3)(B). Publishers provide the limited interrogatory responses herein solely because such responses were specifically ordered by the Court, and without waiver to the attorney work product protection that applies to all other information regarding their legal investigation. Publishers maintain their objections to disclosing any additional details regarding their legal investigation, on these work product protection grounds and the other grounds stated herein.

Finally, consistent with the Court's recognition "that there is some subjectivity in the categories" and its instruction that, "[t]o the extent Publishers determine that additional granularity is required, they shall provide results for such additional categories as needed and provide a written explanation of such additional categories to Anthropic," ECF No. 545 at 9, Publishers have provided results for additional categories and explained those categories below. Subject to Publishers' objections, in accordance with ECF No. 545, Publishers respond as follows:

For the 5-million-record sample:

a. "The total number of Publishers' prompt-output pairs contained in the 5-million record sample" (ECF No. 545 at 7): 888 prompt-output pairs, which are contained in 392 out of the 5 million records in the Claude sample produced by Anthropic. This number includes:

   i. Prompts that did not request Claude generate an output containing lyrics, ("Non-lyrics prompts"): 200.

   ii. Prompts requesting lyrics for songs other than the Works-in-Suit ("Non-WIS prompts"): 122.

b. "The number of Publishers' prompts therein that resulted in verbatim reproduction of lyrics of any of the Works-in-Suit ('positive results')" (ECF No. 545 at 8)[1]: 13.

c. The number of Publishers' prompts therein that resulted in near-verbatim reproduction of lyrics of any of the Works-in-Suit ("near-verbatim results")[2]: 24 .

d. The number of Publishers' prompts therein that resulted in reproduction of half or more of the lyrics of any of the Work-in-Suit ("over half results"): 50.

[1] "Positive Results" in this context means the Claude output contains a 100% match of the lyrics for a given song, including only differences in line breaks, capitalization, punctuation, or other non-substantive changes.

[2] "Near-verbatim reproduction" in this context means the Claude output contains a complete copy of the lyrics for a given song, allowing only for minor word changes or omissions.

e. "The number of Publishers' prompts therein that resulted in partial reproduction of lyrics of any of the Works-in-Suit sufficient that Publishers contend such reproduction constitutes infringement, including cases either where only a portion of the lyrics were provided or where the entire lyrics were provided but certain parts included AI hallucinations (Publishers' contention) or lyrics written by Claude (Anthropic's contention) ('disputed results')" (ECF No. 545 at 8): 61.

f. "The number of Publishers' prompts therein that resulted in successful invocation of Anthropic's guardrails ('negative guardrail results')" (ECF No. 545 at 8): 35.

g. "The number of Publishers' prompts therein that that resulted in other concededly non-infringing answers, i.e., non-sequitur or otherwise irrelevant answers or answers which reproduced a concededly de minimis amount of a Work-in-Suit ('other negative results')" (ECF No. 545 at 8): 383.

For the pre-suit investigation:

a. "The total number of prompts submitted by Publishers in the course of their pre-suit investigation" (ECF No. 545 at 8): 6,931, including:

   i. Non-lyrics prompts: 59.

   ii. Non-WIS prompts: 4,489.

b. Positive results: 106.

c. Near-verbatim results: 524.

d. Over-half results: 922.

e. Disputed results: 529.

f. Negative guardrail results: 41.

g. Other negative results: 261.

For the post-suit investigation:

a. "The total number of prompts submitted by Publishers in the course of their post-suit investigation" (ECF No. 545 at 8): 2,325, including:

   i. Non-lyrics prompts: 357.

   ii. Non-WIS prompts: 481.

b. Positive results: 14.

c. Near-verbatim results: 81.

d. Over-half results: 138.

e. Disputed results: 315.

f. Negative guardrail results: 497.

g. Other negative results: 442.

Dated: April 13, 2026

Respectfully submitted,

/s/ Andrew Guerra

OPPENHEIM + ZEBRAK, LLP
Matthew J. Oppenheim
Nicholas C. Hailey
Jeffrey M. Gould
Corey Miller
Keith Howell
Audrey L. Adu-Appiah
(admitted *pro hac vice*)
4530 Wisconsin Ave., NW, 5th Floor
Washington, DC 20016
Telephone: (202) 480-2999
matt@oandzlaw.com
nick@oandzlaw.com
jeff@oandzlaw.com
corey@oandzlaw.com
khowell@oandzlaw.com
aadu-appiah@oandzlaw.com

Alexander Kaplan
Jennifer Pariser
Andrew Guerra
Bret Matera
Timothy Chung
Michelle Gomez-Reichman
(admitted *pro hac vice*)
461 5th Avenue, 19th Floor
New York, NY 10017
Telephone: (212) 951-1156
alex@oandzlaw.com
jpariser@oandzlaw.com
andrew@oandzlaw.com
bmatera@oandzlaw.com
tchung@oandzlaw.com
mgomez-reichman@oandzlaw.com

COBLENTZ PATCH DUFFY & BASS LLP
Jeffrey G. Knowles (SBN 129754)
One Montgomery Street, Suite 3000
San Francisco, CA 94104
Telephone: (415) 391-4800
ef-jgk@cpdb.com

COWAN, LIEBOWITZ & LATMAN, P.C.
Richard S. Mandel
Jonathan Z. King
Richard Dannay
(admitted *pro hac vice*)
114 West 47th Street
New York, NY 10036-1525
Telephone: (212) 790-9200
rsm@cll.com
jzk@cll.com
rxd@cll.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2026, I caused the foregoing document to be served on the following counsel via email:

WILMER CUTLER PICKERING HALE AND DORR LLP

Sonal Mehta (SBN 222086)
sonal.mehta@wilmerhale.com
Allison Bingxue Que (SBN 324044)
allison.que@wilmerhale.com
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
(650) 858-6000
Fax: (650) 858-6100

Joseph Taylor Gooch (SBN 294282)
taylor.gooch@wilmerhale.com
Kyle Edwards Haugh (SBN 323952)
kyle.haugh@wilmerhale.com
50 California Street
Suite 3600
San Francisco, CA 94111
(628) 235-1002

Robin C. Burrell (admitted *pro hac vice*)
robin.burrell@wilmerhale.com
Ari Holtzblatt (admitted *pro hac vice*)
ari.holtzblatt@wilmerhale.com
2100 Pennsylvania Avenue NW
Washington, DC 20037
(202) 663-6964

Louis W. Tompros (admitted *pro hac vice*)
louis.tompros@wilmerhale.com
Stephanie Lin (admitted *pro hac vice*)
stephanie.lin@wilmerhale.com
Disha Patel (admitted *pro hac vice*)
Disha.Patel@wilmerhale.com
60 State Street
Boston, MA 02109
(617) 526-6886

Attorneys for Defendant

/s Andrew Guerra
Andrew Guerra