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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

DECLARATION OF ROBIN BURRELL IN SUPPORT OF ANTHROPIC'S REPLY IN SUPPORT OF MOTION FOR SUMMARY JUDGMENT

Judge: Hon. Eumi K. Lee

I, Robin Burrell, declare as follows:

1. I am an attorney at the law firm Wilmer Cutler Pickering Hale and Dorr LLP. I am duly licensed to practice in the District of Columbia, and admitted to appear *pro hac vice* in this matter. I represent Defendant Anthropic PBC in this matter.

2. I submit this declaration in support of Anthropic's Reply in Support of Motion for Summary Judgment. I have personal knowledge of the matters stated in this declaration, including based on my review of the documents referenced herein. If called as a witness, I could and would competently testify to them.

3. Attached hereto as **Exhibit 160** is a true and correct copy of excerpts of the deposition of Jared Kaplan, taken November 21, 2025.

4. Attached hereto as **Exhibit 161** is a true and correct copy of excerpts of the Opening Expert Report of Joshua Dennis, dated December 19, 2025.

5. Attached hereto as **Exhibit 162** is a true and correct copy of a document produced by Anthropic, bearing the beginning Bates No. Anthropic_0000441108.

6. Attached hereto as **Exhibit 163** is a true and correct copy of excerpts from the deposition transcript of Michael Smith, taken on February 23, 2026.

7. Attached hereto as **Exhibit 164** is a true and correct copy of excerpts from the deposition transcript of Dario Amodei, taken January 8, 2026.

8. Attached hereto as **Exhibit 165** is a true and correct copy of excerpts from the deposition transcript of Thomas B. Brown, Jr., taken January 26, 2026.

9. Attached hereto as **Exhibit 166** is a true and correct copy of excerpts from the deposition transcript of David Kokakis, taken November 11, 2025.

10. Attached hereto as **Exhibit 167** is a true and correct copy of excerpts from the 30(b)(6) deposition transcript of Thomas Turvey, taken November 5, 2025

11. Attached hereto as **Exhibit 168** is a true and correct copy of compilation of UMPG licensing agreements, marked as Exhibit 25 at the November 11, 2025 deposition of David Kokakis.

12. Attached hereto as **Exhibit 169** is a true and correct copy of Liu, E. et al., *Somesite I Used To Crawl: Awareness, Agency and Efficacy in Protecting Content Creators From AI Crawlers*, dated October 2025, marked as Exhibit 3 at the February 20, 2026 deposition of Ben Zhao.

13. Attached hereto as **Exhibit 170** is a true and correct copy of *AI Licensing by Copyright Owners*, Copyright Alliance, dated October 7, 2025, https://copyrightalliance.org/artificial-intelligence-copyright/licensing/copyright-owners.

14. Attached hereto as **Exhibit 171** is a true and correct copy of UMPG report titled *Universal Music Group Second Quarter and First Half Ended June 30, 2026*, https://assets.ctfassets.net/e66ejtqbaazg/9t6CcXhginfFzCRi8wsCb/a6c1ab21e05319aa66f19d2512afdd6f/UMG_1H26_EARNINGS_SLIDES.pdf.

15. Attached hereto as **Exhibit 172** is a true and correct copy of *Universal Music Group First Half 2026 Earnings Call Transcript*, Seeking Alpha, dated July 30, 2026, https://seekingalpha.com/article/4928099-universal-music-group-n-v-unvgy-q2-2026-earnings-call-transcript.

16. Attached hereto as **Exhibit 173** is a true and correct copy of excerpts from the 30(b)(6) deposition transcript of Ben Mann, taken November 20, 2025.

17. Attached hereto as **Exhibit 174** is a true and correct copy of excerpts from the deposition transcript of Michael Smith, taken on April 9, 2026.

18. Attached hereto as **Exhibit 175** is a true and correct copy of Claude Platform Docs: System Prompts, Anthropic, dated July 24, 2026, https://platform.claude.com/docs/en/release-notes/system-prompts.

19. Attached hereto as **Exhibit 176** is a true and correct copy of a document produced by Anthropic, bearing the beginning Bates No. Anthropic_0000079024.

20. Attached hereto as **Exhibit 177** is a true and correct copy of a document produced by Anthropic, bearing the beginning Bates No. Anthropic_0000087853.

21. Attached hereto as **Exhibit 178** is a true and correct copy of a document produced by Anthropic, bearing the beginning Bates No. Anthropic_0000616615.

22. Attached hereto as **Exhibit 179** is a true and correct copy of MusixMatch Song Lyrics for "Bitter Sweet Symphony," marked as Exhibit 14 at the October 29, 2025 deposition Alisa Coleman.

23. Attached hereto as **Exhibit 180** is a true and correct copy of MusixMatch Song Lyrics for "Sweet Home Alabama," marked as Exhibit 26 at the November 11, 2025 deposition of David Kokakis.

24. Attached hereto as **Exhibit 181** is a true and correct copy of MusixMatch Song Lyrics for "Roxanne," marked as Exhibit 30 at the November 11, 2025 deposition of David Kokakis.

25. Attached hereto as **Exhibit 182** is a true and correct copy of a document produced by Plaintiffs, bearing the beginning Bates No. Plaintiffs_0000002304.

26. Attached hereto as **Exhibit 183** is a true and correct copy of a document produced by Anthropic, bearing the beginning Bates No. Anthropic_0000018309.

27. Attached hereto as **Exhibit 184** is a true and correct copy of excerpts from the deposition transcript of Dr. Ben Zhao, taken February 20, 2026.

I declare that the foregoing is true and correct under penalty of perjury.

Executed on this 8th day of September, 2026, in New York, New York.

/s/ *Robin C. Burrell*
Robin C. Burrell

SIGNATURE ATTESTATION

Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that concurrence in the filing of this document was obtained from the signatory of this document. I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 8, 2026

/s/ *Sonal N. Mehta*
Sonal N. Mehta