EXHIBIT 161

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

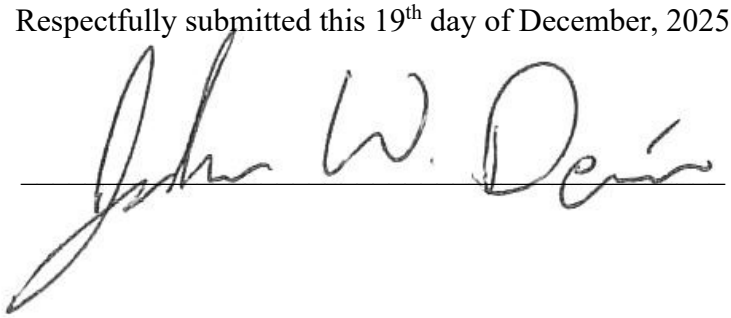
Defendant.

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

Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

EXPERT REPORT OF JOSHUA W. DENNIS

Respectfully submitted this 19th day of December, 2025



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

UNDER PROTECTIVE ORDER

the public on March 14, 2023,[77] which show the ways in which Anthropic prompted Claude AI models during development of the models and prior to Anthropic's release of Claude to the public. Certain Sample Records also reflect that they relate to Anthropic employees, based on the identification of @anthropic.com email addresses.

55. I have been provided by Counsel with 65 documents containing Records from Anthropic employees that are the subject of my analysis ("Employee Records"), as shown in **Exhibit 6**.

B. Data Exclusions and Limitations

i. Exclusion of Publisher and/or Anthropic Employee Accounts

56. I understand that the provided Work-in-Suit Records and Sample Song Records above exclude Records known to correspond to Claude accounts associated with Publishers, their counsel, and their investigators, and/or Anthropic and its counsel.[78]

57. I understand that the Records Anthropic has produced as part of this litigation typically do not identify the specific Claude user or user email address, and instead identify the user only by an anonymized Unique ID value. Unless the Work-in-Suit Records and Sample Song Records are associated with Claude accounts registered under certain email addresses known to be associated with Publishers, their counsel, or their investigators (e.g., @oandzlaw.com) or Anthropic and its counsel (e.g., @anthropic.com), I understand that Anthropic has produced the records without metadata identifying the user or user email address, and has instead identified the user by a user-specific anonymized Unique ID value. I understand that Anthropic separately identified, via its third-party document review vendor, certain Unique ID values that correspond to known email addresses used by Publishers, their counsel, or their investigators as part of their investigation of Claude, and that Publishers have excluded records corresponding to these Unique ID values from the Work-in-Suit Records and Sample Song Records.

ii. Date Limitations

58. I understand that Anthropic had an approximately 26-day data retention policy. As such, Anthropic does not have records prior to September 22, 2023 (i.e., more than 26 days prior to the

[77] Introducing Claude, ANTHROPIC (March 14, 2023), https://www.anthropic.com/news/introducing-claude, (Anthropic_0000349548).

[78] See e.g., Email exchange between Nick Hailey (Oppenheim + Zebrak, LLP) and Kyle Haugh (Wilmer Hale), Re: Concord v. Anthropic - Court-ordered response to Anthropic's Interrogatory 6, October 14-21, 2025.