Exhibit B

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

Expert Reply Report of Colin E. Stokes

February 13, 2026

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I. INTRODUCTION

1. I submitted an opening report in this matter on December 19, 2025 (the "Stokes Report").[1] Any defined terms in the Stokes Report that appear here maintain the same meaning. On January 23, 2026, Dr. Zhao submitted a rebuttal report (the "Zhao Rebuttal Report").[2] Counsel for Anthropic PBC ("Anthropic") has asked me to respond to certain opinions in the Zhao Rebuttal Report and review certain materials identified in the expert report of Joshua Dennis (the "Dennis Report")[3] related to the role of lyrics in musical composition, the intentions of composers in creating and using lyrics in conjunction with other elements of musical composition, and the ways in which generative artificial intelligence ("genAI") tools may support—rather than replicate or replace—the creative process. My professional background, qualifications, and compensation are unchanged from those described in the Stokes Report.

2. A list of materials considered in the preparation of this reply report is attached as **Appendix A.**

3. My opinions are based on information available to me as of the date of this report, and I reserve the right to supplement or amend my report should new information become available, or in response to other expert opinions offered by Plaintiffs. At trial, I may use demonstrative exhibits—such as documents, graphics, videos, charts, case material, or other visual aids—to explain my views.

II. SUMMARY OF CONCLUSIONS

4. Based on my professional experience as a composer, songwriter, cellist, and producer, my expertise as a researcher in AI-integrated composition, and my review of the Zhao Rebuttal Report, the Dennis Report, and other relevant documents and materials produced in this case, I have reached the following conclusions:

    a. Lyrics and poetry share certain properties; some poems get adapted into songs, while some lyrics can be considered poetry. Other lyrics, particularly lyrics of pop songs, may be more repetitive and use more vernacular language. Regardless, lyrics derive their unique expressive value when paired with other elements of musical compositions. As Dr. Zhao acknowledges, without the context of the accompanying

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[1] Expert Report of Colin E. Stokes, *Concord Music Group, Inc. et al. v. Anthropic PBC*, 5:24-cv-03811-EKL-SVK, December 19, 2025 and associated materials ("Stokes Report").

[2] Rebuttal Expert Report of Dr. Ben Zhao, *Concord Music Group, Inc. et al. v. Anthropic PBC*, 5:24-cv-03811-EKL-SVK, January 23, 2026 and associated materials ("Zhao Rebuttal Report").

[3] Expert Report of Joshua W. Dennis, *Concord Music Group, Inc. et al. v. Anthropic PBC*, 5:24-cv-03811-EKL-SVK, December 19, 2025 and associated materials ("Dennis Report").

musical elements such as melody, harmony, rhythm, or instrumentation, lyrics lack much of their expressive value. See **Section III**.

b. Composers and songwriters primarily use lyrics—in combination with musical elements—to create or enhance emotional connection with their audiences. They can achieve this via a variety of compositional practices. See **Section IV**.

c. As evidence considered in the opening report of Dennis Report shows, even among conversations identified by Plaintiffs as examples where Claude allegedly output lyrics to works-in-suit, Claude can serve as a thought-starter and brainstorming partner for users interested in composition and songwriting. See **Section V**.

III. LYRICS AND POETRY SHARE CERTAIN PROPERTIES, THOUGH, AS DR. ZHAO ACKNOWLEDGES, LYRICS ARE ONLY ONE ELEMENT OF MUSICAL COMPOSITIONS AND TAKE ON PARTICULAR MEANING WHEN PAIRED WITH OTHER ELEMENTS SUCH AS MELODY, RHYTHM, OR INSTRUMENTATION

5. Dr. Zhao argues that the "stylistically rich" and "idiosyncratic" nature of lyrics makes them particularly valuable as training data for general purpose LLMs.[4] He claims that "unlike poems, lyrics are constructed by taking account of rich musical information: melody, rhythm, instrumentation, the quality of the singer's voice, [and] other qualities of the recording."[5] As a result, he argues that they "belong to a diverse, heterogeneous domain that is different from poems and thus cannot be covered by poetry data."[6]

6. However, Dr. Zhao fails to take into consideration the interplay between poems and lyrics. In fact, the word *lyric* is derived from Greek and Latin roots related to the harp-like instrument the lyre, and it referred to poetry that was meant to be recited with musical accompaniment. It was not until 1876 that the current meaning, "words of a popular song," took hold.[7] It is therefore not surprising that poems can be adapted and used as the basis of lyrics in musical compositions. Dr. Zhao points to quotes from an article by Matthew Zapruder to argue the differences between poetry and lyrics. But in that same article, the author agrees that poems can be adapted into song lyrics: "As for the question of whether poems can function as song

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4 Zhao Rebuttal Report, ¶ 104.

5 Zhao Rebuttal Report, ¶ 104.

6 Zhao Rebuttal Report, ¶ 104.

7 Oxford English Dictionary, "Lyric," https://www.oed.com/search/dictionary/?scope=HistoricalThesaurus&q=lyric, accessed February 10, 2026; Etymonline, "Origin and History of Lyric," https://www.etymonline.com/word/lyric, accessed February 11, 2026.

lyrics, the answer seems to be, in the right hands, absolutely yes."[8] For example, the national anthem of the United States ("The Star-Spangled Banner") as well as an iconic song to welcome the New Year ("Auld Lang Syne") were both originally poems, only later set to music to become the songs we know them as today.[9] The interplay between poems and lyrics can work both ways and some lyrics have particular poetic depth. Again, in the words of Matthew Zapruder from the same article replied upon by Dr. Zhao, "[m]any musical artists present their song lyrics as poetry."[10] For example, many consider Bob Dylan— some of whose songs are among the works-in-suit[11]—not only a songwriter, but also a poet, validated by the fact that in 2016 he was awarded the Nobel Prize for Literature "for having created new poetic expressions within the great American song tradition."[12, 13]

7. However, not all lyrics are commonly thought of as poetry.[14] As I explained in Section III.A.2 of my opening report, lyrics may often consist, at least in part, of simple commonplace words or phrases, which by themselves may contain limited narrative meaning. This is especially common in pop music,[15] in which vernacular language is often the norm, in contrast with

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8 Zapruder, Matthew, "The Difference Between Poetry and Song Lyrics," *Boston Review*, December 6, 2012, https://www.bostonreview.net/forum/poetry-brink/difference-between-poetry-and-song-lyrics, cited in Zhao Rebuttal Report, ¶¶ 104, 109.

9 Maryland Center For History and Culture, "The Star-Spangled Banner," https://www.mdhistory.org/resources/the-star-spangled-banner, accessed December 12, 2025, Anthropic_0000585030–032; Lewis, Robert, "Auld Lang Syne," *Britannica*, December 9, 2025, https://www.britannica.com/topic/Auld-Lang-Syne, Anthropic_0000583994–000. Link to "The Star-Spangled Banner": https://youtu.be/DADmZdbQ9x8. Link to "Auld Lang Syne": https://youtu.be/W_6Vs8pADrQ.

10 Zapruder, Matthew, "The Difference Between Poetry and Song Lyrics," *Boston Review*, December 6, 2012, https://www.bostonreview.net/forum/poetry-brink/difference-between-poetry-and-song-lyrics, cited in Zhao Rebuttal Report ¶ 104, 109.

11 These include: "Blowin' in the Wind," "Like a Rolling Stone," "Simple Twist of Fate," "Tangled Up in Blue," "The Times They Are A-Changin'," "Desolation Row," and "Highway 61 Revisited." First Amended Complaint and Demand for Jury Trial, *Concord Music Group, Inc. et al. vs. Anthropic PBC*, 5:24-cv-03811-EKL-SVK, April 25, 2025 ("First Amended Complaint"), Exhibit A.

12 The Nobel Prize, "Nobel Prize in Literature 2016," https://www.nobelprize.org/prizes/literature/2016/summary, accessed February 9, 2026; Poets.org, "Bob Dylan: 'I'm a Poet, and I Know It'," *Academy of American Poets*, February 21, 2014, https://poets.org/text/bob-dylan-im-poet-and-i-know-it.

13 For example, one study that attempted to use an algorithm to distinguish between articles, lyrics, and poetry frequently misclassified lyrics by Bob Dylan and other "poetic lyricists" as poetry. See Singhi, Abhishek and Daniel G. Brown, "Are Poetry and Lyrics All That Different," *15th International Society for Music Information Retrieval Conference*, 2014, pp. 471–476, Table 4.

14 BaileyShea, Matt, "Introduction: Why Study Lyrics," *Lines and Lyrics An Introduction to Poetry and Song*, Yale University Press, 2021, pp. 1–7, p. 6 ("There has been considerable discussion . . . about whether pop lyrics . . . can rise to the level of poetry.").

15 Pop music is often identifiable through chart success, but more fundamentally it denotes music designed for — and reaching — the broadest possible commercial audience irrespective of genre, whereas popular music is defined broadly as music since industrialization that aligns with the tastes of a large population of people, encompassing a very wide range of styles from vaudeville to heavy metal. Most of the works-in-suit fall under this definition of popular music, with many of them in the pop music genre.

enriched or literary language that may be found in poetry.[16] Studies have found that over the past decades song lyrics are becoming "simpler and more repetitive," with decreasing lexical complexity.[17] Song lyrics are also becoming more similar, which "indicates a loss of diversity."[18] But when paired with the musical elements of a song, even simple lyrics can convey a powerful message. A good example of this is Joe Cocker's work-in-suit "You Are So Beautiful," which repeats the same simple phrase "you are so beautiful // to me // you are so beautiful // to me // can't you see" over musical time, but creates dramatic shifts in emotional meaning with changes in dynamic and vocal timbre.[19]

8. In other instances, lyrics may even include made up or nonsensical words, which only achieve the full expression of the composer when experienced with the underlying musical elements. For example, Phil Collins revealed that he based his song "Sussudio"[20] around a nonsense word "sussudio"; he initially intended to use it as a placeholder while developing the lyrics but did not find a suitable replacement.[21] In this case, it is the musical setting of the lyrics and the performance of those lyrics that deliver the expressive freight of the song, rather than any intrinsic meaning of the lyrics themselves, as "sussudio" has no meaning outside the context of this particular musical setting.

9. Regardless of whether lyrics are complex and poetic, more simplistic in both vocabulary and structure, or something in between, lyrics—as text alone—do not capture the full expressive value of a composition until they are paired with underlying music. This opinion, expressed in my opening report, is reiterated in Dr. Zhao's claims that lyrics are only a part of a musical

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[16] Singhi, Abhishek and Daniel G. Brown, "Are Poetry and Lyrics All That Different," *15th International Society for Music Information Retrieval Conference*, 2014, pp. 471–476, Table 6.

[17] Leffer, Lauren, "Song Lyrics Really Are Getting Simpler and More Repetitive, Study Finds," *Scientific American*, March 28, 2024, https://www.scientificamerican.com/article/song-lyrics-really-are-getting-simpler-and-more-repetitive-study-finds ("[N]ew research suggests popular music has indeed undergone some measurable and significant shifts over the past 50 years—with popular song lyrics becoming simpler and more repetitive[.] . . . [The study's authors] basically found that lyrics [have gotten] easier to comprehend.").

[18] Meindertsma, Peter, "Changes in Lyrical and Hit Diversity of Popular U.S. Songs 1956–2016," *DHQ: Digital Humanities Quarterly*, Vol. 13, No. 4, 2019, pp. 1–12 ("The global trend, however, is a slowly decreasing variance, which means that lyrics become more similar and again indicates a loss of diversity. . . . I have also demonstrated that . . . the variances of sampled Type Token ratio (an indicator for lexical complexity) have decreased over time.").

[19] Link to Joe Cocker's "You Are So Beautiful": https://youtu.be/DhMnhIY1pE0&t=12. See UMPG_0000018882–898, Sheet Music for "You Are So Beautiful", 1974.

[20] Link to Phil Collins' "Sussudio": https://youtu.be/r0qBaBb1Y-U&t=70.

[21] Melchior, Al, "The Reverse-Engineering Behind the Meaning of Phil Collins' 'Sussudio'," *American Songwriter*, January 16, 2024, https://americansongwriter.com/the-reverse-engineered-meaning-behind-phil-collins-sussudio, Anthropic_0000582686–695 ("Everyone who enjoyed the song wasn't necessarily wowed by its lyrics. It was hardly a surprise when Collins revealed that 'Sussudio' was a nonsense word he created while improvising the lyrics. He intended to replace it with an actual word but never found one that fit the melody as well.").

composition and they obtain their expressive value from being paired with music.[22] Musical compositions are constructed from many important, expressive elements, and sometimes lyrics can be one of these elements. However, without the other essential elements of musical composition described in my opening report, lyrics alone cannot convey the full expressive breadth, or engender the same emotional response, as lyrics can in their appropriate musical context. My conclusion here is corroborated by Bob Dylan who said, in his Nobel Prize for Literature lecture: "lyrics in songs are meant to be sung, not read on a page."[23]

10. Differences in the underlying non-lyrical elements or a change in the performative interpretation can have a large impact on what is being expressed by a composition, and how the audience experiences it.[24] Adele's "Turning Tables," a work-in-suit, is a good example of the use of dynamics and tempo for musical expression. The first verse, with lyrics about fighting within a close relationship, starts at a quiet dynamic with minimal instrumentation, suggesting a fragile and defeated emotional state. This is followed by a dramatic change in dynamic and perceived tempo in the chorus, emphasizing the lyrical focus on defiance and empowerment.[25] The combination of these compositional elements creates an emotional effect beyond what is conveyed by the words alone. In another example, Eric Clapton's "Tears in Heaven" emphasizes a minor chord on important words like "name" and "heaven" in the first verse and at important structural events like the beginning of the chorus.[26] This, in combination with a descending bass line, known as a lament bass, conveys the emotional depth and sadness of the song in a way that the lyrics alone could not.

11. As the many examples I cite in Section III.C of my opening report show, changes to non-lyrical elements can substantially change the meaning of a composition, even as the lyrical component remains unchanged, demonstrating that the text of the lyrics alone does not capture the full range of rich musical information. In what is commonly known as a "cover," artists from different genres can use the same set of lyrics to convey different expressive intent. In one notable example, Otis Redding's 1965 song "Respect" is sung from the male perspective and

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22 Zhao Rebuttal Report, ¶¶ 104, 109.

23 Dylan, Bob, "Nobel Lecture," *The Nobel Foundation*, https://www.nobelprize.org/prizes/literature/2016/dylan/lecture/, accessed February 11, 2026 ("But songs are unlike literature. They're meant to be sung, not read. The words in Shakespeare's plays were meant to be acted on the stage. Just as lyrics in songs are meant to be sung, not read on a page.").

24 As I explain in Section III.A of my opening report, musical compositions consist of many basic non-lyrical—and sometimes also lyrical—elements, including pitch and melody, rhythm and meter, expression (tempo and dynamics), harmony, texture, form and duration, and timbre.

25 Link to Adele's "Turning Tables": https://youtu.be/bsFCO8-oCEQ.

26 Link to Eric Clapton's "Tears in Heaven": https://youtu.be/VVqXLXMch9g&t=12.

reenforces a traditional male-dominated hetero-relational power structure.[27] In contrast, Aretha Franklin's resetting of these lyrics, with cosmetic textual changes and the important change of perspective to a female vocalist, changed the meaning of the song from what some scholars articulate as misogynistic, to a feminist anthem.[28] A similar example of changed expression can be heard in Jimi Hendrix's cover of work-in-suit "All Along the Watchtower."[29] The original song by Bob Dylan uses a faster tempo (128BPM)[30] and a lighter folk-rock texture with acoustic guitar, harmonica, and a simple drum-set pattern which lend a dark foreboding character to the song.[31] Jimi Hendrix's version of the song uses a slower tempo (112BPM), virtuosic lead electric guitar riffs, electric rhythm guitar, and distorted guitar interjections, raucous drum-set writing with complex fills, and vocals characterized by growls and other timbral effects. These musical elements combine to create a sense of rage, defiance, urgency, and tumult.[32]

12. Poems and lyrics share certain properties but lyrics take on particular meaning when paired with other elements of musical compositions, such as melody, rhythm, or instrumentation. Poems can serve as a foundation for song lyrics and some song lyrics are considered poetic. In other instances, lyrics may use repetitive, simple, or vernacular language, and are increasingly made up of less diverse language.[33] Regardless of whether lyrics of a song tend toward one or the other end of the spectrum of lyrical complexity, lyrics—as text on its own and without the accompanying musical setting—do not convey the full weight of the artists' primarily intended artistic expression.

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27 NPR, "'Respect' Wasn't a Feminist Anthem Until Aretha Franklin Made It One," February 14, 2017, https://www.npr.org/2017/02/14/515183747/respect-wasnt-a-feminist-anthem-until-aretha-franklin-made-it-one, Anthropic_0000585279–293 ("[Aretha Franklin's] track was actually a clever gender-bending of a song by Otis Redding, whose original reinforced the traditional family structure of the time: Man works all day, brings money home to wife and demands her respect in return."). Link to Otis Redding's "Respect": https://youtu.be/rEgKSj1VHZ0&t=13.

28 NPR, "'Respect' Wasn't a Feminist Anthem Until Aretha Franklin Made It One," February 14, 2017, https://www.npr.org/2017/02/14/515183747/respect-wasnt-a-feminist-anthem-until-aretha-franklin-made-it-one, Anthropic_0000585279–293. Link to Aretha Franklin's "Respect": https://youtu.be/A134hShx_gw&t=9.

29 Link to Jimi Hendrix's "All Along the Watchtower": https://youtu.be/TLV4_xaYynY.

30 BPM refers to beats per minute and is a measure of tempo.

31 Link to Bob Dylan's "All Along the Watchtower": https://youtu.be/bT7Hj-ea0VE.

32 Zak III, Albin J., "Bob Dylan and Jimi Hendrix: Juxtaposition and Transformation 'All Along the Watchtower'," *Journal of the American Musicological Society*, Vol. 57, No. 3, 2004, pp. 599–644, Anthropic_0000586365–411.

33 Leffer, Lauren, "Song Lyrics Really Are Getting Simpler and More Repetitive, Study Finds," *Scientific American*, March 28, 2024, https://www.scientificamerican.com/article/song-lyrics-really-are-getting-simpler-and-more-repetitive-study-finds; Meindertsma, Peter, "Changes in Lyrical and Hit Diversity of Popular U.S. Songs 1956–2016," *DHQ: Digital Humanities Quarterly*, Vol. 13, No. 4, 2019, pp. 1–12.

IV. COMPOSERS AND SONGWRITERS PRIMARILY COMBINE LYRICS WITH MUSIC TO CREATE OR ENHANCE EMOTIONAL CONNECTION WITH THEIR AUDIENCE

13. Dr. Zhao disagrees that "Anthropic uses Plaintiffs' copyrighted materials for a different purpose than the originally intended use by the copyright holders,"[34] and opines that "the purpose of using lyrics in training is . . . [for the] ultimate goal of building a model that can be used for a wide variety of purposes, including responding to prompts about music lyrics, reproducing lyrics, creating new lyrics, or answering questions about those lyrics."[35] Dr. Zhao reaches this conclusion without offering any expertise in "the purpose of music lyrics."[36] As a composer with a musical career spanning over two decades, I disagree with Dr. Zhao's conclusions.

14. Composers and songwriters combine music and lyrics in a variety of ways, as I discussed in my opening report. However, regardless of the manner in which music and lyrics are combined, composers primarily compose music to communicate their ideas and emotions to their audiences.[37,38] In one study involving analysis of interviews of over 30 singer-songwriters, the study author found that "[m]any participants describe playing and listening to original songs as a way of 'sharing emotional experiences,' 'resonating emotionally,' 'experiencing each other's feelings,' and forging 'emotional connections.' When asked what makes a 'good' song, songwriters point to its ability to convey emotion, for example, good songs 'make me cry,' 'hit the heart,' and 'make me feel something,' all of which represent emotionally embodied

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[34] Zhao Rebuttal Report, ¶ 65.

[35] Zhao Rebuttal Report, ¶ 68.

[36] Zhao Rebuttal Report, ¶ 66; Expert Report of Dr. Ben Zhao, *Concord Music Group, Inc. et al v. Anthropic PBC*, 5:24-cv-03811-EKL-SVK, December 19, 2025 and associated materials, ¶¶ 1–2, Appendix A.

[37] See, e.g., "The 100 Greatest Songwriters of All Time," *Rolling Stone*, https://www.rollingstone.com/music/lists/100-greatest-songwriters, accessed February 11, 2026 ("[Taylor Swift:] 'I write songs about my feelings. I'm told I have a *lot* of feelings.'"; "[Jay-Z:] 'I try to feel the emotion of the track and try to feel what the track is talking about, let that dictate the subject matter,' he has said. 'The melody comes second, and then the words.'"; "[George Harrison:] Harrison described songwriting as a means to 'get rid of some subconscious burden,' comparing the process to 'going to confession.'"; "[Neil Diamond:] 'I'm motivated to find myself,' he told Rolling Stone in 1976. 'I do it in a very silly way. I write these little songs and go and sing them . . . It seems like an odd way to gain an inner sense of acceptance of the self. But it's what I do.'").

[38] From an evolutionary musicology perspective, music is a biologically grounded system of acoustic communication, suggesting that its primary function is relational. See, e.g., Brown, Steven, Björn Merker, and Nils L. Wallin, "An Introduction to Evolutionary Musicology," *The Origins of Music*, edited by Steven Brown, Björn Merker, and Nils L. Wallin, The MIT Press, 1999, pp. 1–24. See also Ball, Philip, "Overture: Why We Sing," *The Music Instinct: How Music Works and Why We Can't Do Without It*, Vintage Books, 2011, pp. 9–31, pp. 11–12 ("Ethnomusicologists have documented an abundance of social functions for music: it expresses emotion, induces pleasure, accompanies dance, validates rituals and institutions, promotes social stability"; "Music can be a vehicle for communication, sometimes with exquisite precision.").

experience."[39] The author concluded that "[f]or songwriters, it is not just about what is being said, or just about what is being played, but instead about their unique combinations, and how the result is thought to represent an authentic form of communication and emotional expression."[40] The author further found through the interviews that "an important part of what it means to be a songwriter" is "to evoke an emotionally embodied experience in listeners, whether through 'goosebumps,' 'shivers,' or tears."[41]

15. Musicians do not typically intend, as a primary purpose, to write music for the sake of future lyrical analysis or discussions on the meaning of lyrics, or to answer questions about their lyrical writing. For example, as lyricist Bernie Taupin, who collaborated on writing many songs for Elton John, put it: "Andy Warhol never explained what his paintings were about, . . . [h]e'd just say, 'What does it mean to you?' That's how I feel about songs."[42] Similarly, Bob Dylan, in his Nobel Prize for Literature lecture, reflected: "If a song moves you, that's all that's important. I don't have to know what a song means. I've written all kinds of things into my songs. And I'm not going to worry about it – what it all means."[43]

16. As I discussed in my opening report, varying compositional practices demonstrate that lyrics are only part of the way composers communicate their ideas and emotions to audiences through their musical compositions. Some composers may compose music before adding lyrics,[44] or may use existing sources, such as poems or lyrics from existing songs, as the basis of their new composition. Regardless of the exact nature of the compositional process, the composer or songwriter may use lyrics to create or enhance emotional connection with their audience. But, as explained above and in my original report, lyrics alone do not convey the full emotional weight of a song in its entirety.

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[39] Cobb, Maggie Colleen, "'When I Feel a Song in Me': Exploring Emotions Through the Creative Songwriting Process," *Symbolic Interactionist Takes on Music Studies in Symbolic Interaction*, Vol. 47, edited by Christopher J. Schneider and Joseph A. Kotarba, Emerald Group Publishing Limited, 2016, pp. 61–79 ("Cobb (2016)"), p. 73. Songwriters also report using song writing as a way of working through and understanding their own emotional experience. See Cobb (2016), p. 72 ("For most participants, songwriting is a way of 'channeling,' organizing, and making sense of overwhelming, often confusing, emotional experiences.").

[40] Cobb (2016), p. 62.

[41] Cobb (2016), p. 73.

[42] "The 100 Greatest Songwriters of All Time," *Rolling Stone*, https://www.rollingstone.com/music/lists/100-greatest-songwriters, accessed February 11, 2026.

[43] Dylan, Bob, "Nobel Lecture," *The Nobel Foundation*, https://www.nobelprize.org/prizes/literature/2016/dylan/lecture/, accessed February 11, 2026.

[44] In one famous example, Paul McCartney composed the music for "Yesterday" using the placeholder lyrics, "Scrambled eggs, oh my baby, how I love your legs…" before writing the actual lyrics to the song. See McCartney, Paul, "Paul McCartney Reveals the Stories Behind His Greatest Hits," *The Times*, October 17, 2021, https://www.thetimes.com/culture/music/article/paul-mccartney-the-lyrics-book-beatles-0xhq8trnd, Anthropic_0000586034–058.

17. In some cases, lyrics may play a secondary role in the process of song composition. In a common practice called "toplining," musicians compose music first, and then send that composition to a team of individuals who will add the melody and lyrics. David Bowie, for example, would add lyrics after receiving music from the band.[45] Some musicians may take existing work, either lyrics from an existing song or a poem, and then add or alter the surrounding music. Covers are a common practice in this form of songwriting.

18. In other cases, lyrics may take an equal role in the process of composition. Some composers and songwriters work with lyricists to create music and lyrics collaboratively, like George and Ira Gershwin.[46] Elton John and Bernie Taupin also frequently wrote songs together, where Taupin would write lyrics, and then John would separately add the music and melody.[47] Similarly, singer-songwriters often write both the music and the lyrics to their songs, and can do so in either order. For example, Taylor Swift sometimes will start by writing lyrics and then adding music, and other times will first compose the melody and add lyrics after.[48]

19. Regardless of the way the composer or songwriter combines lyrics and music, and the relative role lyrics play in the compositional process, the primary purpose of musical compositions is to convey a songwriters' ideas and elicit emotional responses in audiences and not, as the Zhao Rebuttal Report implies, to have someone question the meaning behind the lyrics or analyze them.

V. USER INTERACTIONS ILLUSTRATE CLAUDE'S CREATIVE BENEFITS AS A THOUGHT STARTER AND BRAINSTORMING PARTNER

20. As I explained in my opening report, composers, songwriters, and users in general can prompt Claude to help them brainstorm or refine ideas for lyrics. In addition to the many examples cited in Section IV.B of my opening report, materials identified contemporaneously with the filing of my opening report in the Dennis Report document this behavior in the record of third-party users' interactions with Claude, even among the set of interactions Plaintiffs identify as

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[45] Blume, Jason, "How to Write to a Music Track: The Art of Toplining," *BMI*, June 23, 2022, https://www.bmi.com/news/entry/how-to-write-to-a-music-track-the-art-of-toplining, Anthropic_0000583923.

[46] The Society of Composers & Lyricists, "George & Ira Gershwin," October 23, 2009, https://thescl.com/hall-of-fame/george-ira-gershwin, Anthropic_0000585865–868.

[47] Grant, Tracy, "Bernie Taupin," *Britannica*, January 6, 2026, https://www.britannica.com/biography/Bernie-Taupin; "The 100 Greatest Songwriters of All Time," *Rolling Stone*, https://www.rollingstone.com/music/lists/100-greatest-songwriters, accessed February 11, 2026 ("Elton said in 1994. 'I let all my expressions and my love and my pain and my anger come out with my melodies. I had someone to write my words for me. Without [Bernie Taupin], the journey would not have been possible.' Their process has remained nearly identical from day one: Bernie writes a lyric and sends it to Elton, who sits down at a piano and turns it into a song.").

[48] Ensemble Performing Arts, "How to Write a Song Like Taylor Swift," https://www.ensembleschools.com/blog/how-to-write-a-song-like-taylor-swift, accessed February 9, 2026.

allegedly containing lyrics from the works-in-suit.[49] These interactions illustrate the creative benefits that Claude offers as a thought-starter and brainstorming partner for users interested in composition and songwriting.

21. In one example, a user working on a song for a cancer benefit used Claude to rewrite and adapt lyrics to a popular song to better fit the occasion. The user used Claude as a jumping off point for creating a version of a familiar song they wanted to sing and play on piano, with lyrics modified to support raising money for the cause. The user iterated with Claude numerous times, requesting revisions, seeking rhymes for certain words, and checking rhyme schemes as they reworked the lyrics.[50]

22. In another instance, a user looking to create songs to help encourage sixth graders to work on their writing skills used Claude to generate parody lyrics for six popular songs, such as "We Are the Champions" and "We Will Rock You" by Queen and "Let It Go" from the animated film Frozen, modified to focus on the topic of improving students' writing.[51] While the song "We Will Rock You" by Queen includes the line "We will, we will rock you," Claude suggested the verse "We will, we will write right." Similarly, while the chorus of "We Are the Champions" starts with "We are the champions, my friend // And we'll keep on fighting till the end," the chorus suggested by Claude started with "We are the writers, my friends // And we'll revise until the end." Throughout the process, the user guided Claude by prompting it to simplify vocabulary and make it appropriate for younger students and requesting specific phrases or particular content.[52]

23. In another type of example, a user seeking to write song lyrics for "a catchy pop tune" provided Claude the start of a song and used Claude to help brainstorm additional lyrics to the song. The user repeatedly iterated with Claude and guided the development by providing feedback such as requesting more metaphorical allusions, asking for increased level of lyrical complexity, removing references to historical figures, changing style, and requesting variations.[53]

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[49] See Dennis Report, Exhibit 4. I understand that these conversations were selected by Plaintiffs and allegedly represent instances where Claude reproduced lyrics to works-in-suit. I understand that these conversations exclude certain records, such as conversations initiated by employees of Anthropic. This is a limited subset of conversations with Claude that relate to works-in-suit, and as such, I do not expect this sample to represent all conversations in which users use Claude as a creative brainstorm partner.

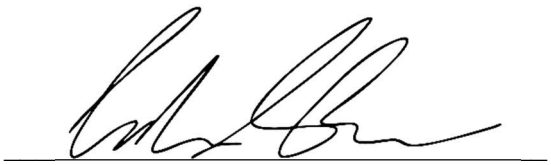
[50] Anthropic_0000061394–447, Anthropic, Conversation Between Human and Claude, November 3, 2023 at -394-408.

[51] Anthropic_0000096498–507, Anthropic, Conversation Between Human and Claude, November 30, 2023. For other examples of users using Claude to generate parody lyrics to various popular songs, see, e.g., Anthropic_0000215659–660, Anthropic, Conversation Between Human and Claude, March 22, 2024; Anthropic_0000208960, Anthropic, Conversation Between Human and Claude, March 14, 2024; Anthropic_0000182873, Anthropic, Conversation Between Human and Claude, February 3, 2024.

[52] Anthropic_0000096498–507, Anthropic, Conversation Between Human and Claude, November 30, 2023.

[53] Anthropic_0000248217–220, Anthropic, Conversation Between Human and Claude, October 11, 2023.

24. As these interactions illustrate, Claude offers users many creative benefits and can serve as a thought starter and brainstorming partner to help them turn ideas into lyrics in a particular style or with certain rhythmic structure, or assist users in refining their own initial draft lyrics into a more polished version.



Colin E. Stokes

Appendix A
Materials Considered

Legal Documents

Expert Report of Colin E. Stokes, *Concord Music Group, Inc. et al. v. Anthropic PBC*, 5:24-cv-03811-EKL-SVK, December 19, 2025 and associated materials.

Expert Report of Dr. Ben Zhao, *Concord Music Group, Inc. et al v. Anthropic PBC*, 5:24-cv-03811-EKL-SVK, December 19, 2025 and associated materials.

Expert Report of Joshua W. Dennis, *Concord Music Group, Inc. et al. v. Anthropic PBC*, 5:24-cv-03811-EKL-SVK, December 19, 2025 and associated materials.

First Amended Complaint and Demand for Jury Trial, *Concord Music Group, Inc. et al. vs. Anthropic PBC*, 5:24-cv-03811-EKL-SVK, April 25, 2025.

Rebuttal Expert Report of Dr. Ben Zhao, *Concord Music Group, Inc. et al. v. Anthropic PBC*, 5:24-cv-03811-EKL-SVK, January 23, 2026 and associated materials.

Bates-Stamped Documents

Anthropic_0000248217–220, Anthropic, Conversation Between Human and Claude, October 11, 2023.

Anthropic_0000208960, Anthropic, Conversation Between Human and Claude, March 14, 2024.

Anthropic_0000215659–660, Anthropic, Conversation Between Human and Claude, March 22, 2024.

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