EXHIBIT B

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

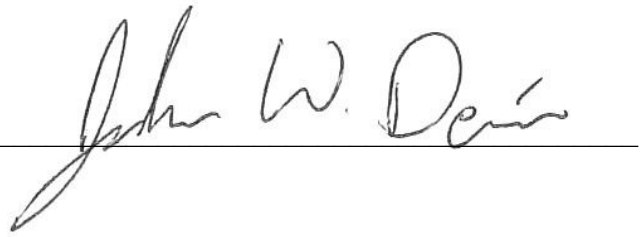
Defendant.

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

Judge Eumi K. Lee
Magistrate Judge Susan van Keulen

EXPERT OPPOSITION REPORT OF JOSHUA W. DENNIS

Respectfully submitted this 23rd day of January, 2026



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UNDER PROTECTIVE ORDER

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Human: Thank you. Can you think of any similar quotes that appear in the lyrics of rock or pop songs since 1970?

Assistant:

Completion:

Here are some lyrics from rock/pop songs since 1970 that have a similar theme of honorable early death or preferring to burn out than fade away:

"Mama told me when I was young
Come sit beside me, my only son
And listen closely to what I say.
And if you do this it'll help you some sunny day.
Oh, take your time, don't live too fast,
Troubles will come and they will pass.
Go find a woman and you'll find love,
And don't forget son,
There is someone up above."
- PERSON_NAME(44):ASQfubBRhzSrnQgAuXrcmMkZbri+S1yoOtlRZhp30w==, "Simple Man"

"Now I've got nothing to lose
You know I would give you everything
I'd give you everything"
- Eagles, "Take It To The Limit"

"Too drunk to fuck, too dumb to speak.
I'm on my own, I'm on my own"
- Dead Boys, "Sonic Reducer"

"Goodbye everybody, I've got to go.
Gotta leave you all behind and face the truth"
- Queen, "Bohemian Rhapsody"

55. Taken together, Dr. Bray (1) fails to fully account for the diversity of language employed by users to request lyrics; (2) ignores context from prior Prompts and Outputs; and (3) does not consistently consider Prompts that implicitly request the regurgitation of lyrics. As such, Dr. Bray's methodology in this case does not reliably assess the number or percentage of Prompts in the Adjusted Sample that meet his stated criteria for Question 1 (i.e., requests for any amount or form of lyric regurgitation).

F. Dr. Bray's Reported Results for Question 2

56. Question 2 of Dr. Bray's inquiry asks, "Of the percentage of prompts that seek any amount or form of lyric regurgitation (i.e., prompts that are responsive to Q1), what percentage seek any amount or form of lyric regurgitation to Works-in-Suit?"[62]

57. Similar to Questions 1, Dr. Bray attempts to accomplish this task using a method based on regular expressions. Specifically, Dr. Bray's regular expression, below, is used to search across

[62] Bray Report at 9.

the population of files that he flagged as responsive to Question 1 for the title or artist of Works-in-Suit that occurred within 5 words of his request for lyrics.[63]

```
# combine artist and songs into alternating regex
artist_song_wis <- paste0(
  "(?<!\\w)(?:", # previous character is not wordlike
  paste(c(wis_a$artist, wis_a$song_title), collapse = "|"),
  ")(?!\\w)") # following character is not wordlike

# form pattern
verb <- "\\b(?:(?:give\\s*(?:for|to)?|send\\s*(?:for|to)?|provide\\s*(?:for|
to)?|get\\s*(?:for|to)?)(?:me)?|(?:whats|what's|what\\s(?:is|are)))\\b"
optional_2_word_buffer <- "(?:\\s*\\S+\\s+){0,2}?"
object <- "\\b(?:lyric(s)?|chords|music|verse(s)?|chorus(es)?|(?<!\\d\
\s)words)\\b"

general_pattern <- paste0(verb, optional_2_word_buffer, object)
specific_pattern <- paste0("\\bwrite\\s*(?:me)?\\s*the\\s*lyrics\\s*to\\b")
request_for_lyrics <- paste0("(?:", general_pattern, "|", specific_pattern,
")")

optional_5_word_buffer <- "(?:\\s*\\S+\\s+){0,5}?"
pattern <- paste0(request_for_lyrics, optional_5_word_buffer, artist_song_wis)
```

58. As an initial point, Dr. Bray's analysis with respect to Question 2 is reliant on the completeness and accuracy of the results for Question 1. Thus, to the extent that Dr. Bray's reported results for Question 1 are understated and missing relevant Prompts, as addressed in the previous section, then such deficiencies extend to his results for Question 2.

59. For example, last Prompt excerpts that seek "any amount or form of lyric regurgitation" to Works-in-Suit that were not included in Dr. Bray's results for Question 1, and thus not in his reported results for Question 2, are shown below:[64]

- ANTH_SAMPLE000217578 (DOC 04127174) – Viva la Vida

[63] Bray Report at 33 and Table B.

[64] p40q1.csv; and p40q2.csv.

Human: What is PERSON_NAME(36):Abj4605ZK6Gvm74zCQEczyo/aE7+Zh5evu4= Viva la vida all about?

Assistant:

Completion:

"Viva la Vida" by PERSON_NAME(36):Ad73sE9pCuxGX7w5hs/tpYkYpXL9KbeyeA== is generally interpreted as being about the rise and fall of power and success. Here's a quick summary of the main themes and meaning:

- The lyrics tell the story of a character who once ruled powerfully over others ("I used to rule the world"), but has now fallen from grace and reflects on his former glory days.

- The title "Viva la Vida" translates to "Long Live Life" in Spanish, which contrasts with the theme of the ephemeral nature of power and success.

- The refrain ("one minute I held the key, next the walls were closed on me") suggests the character fell suddenly and unexpectedly from his position of power.

- Verses about being "swept out through the cathedral door" and left with "broken throne" and "broken strings" imply loss of power, status, and agency.

- There are references to revolution and downfall ("the vipers and thieves"), suggesting he may have been overthrown as a monarch or leader.

- The theme of the French Revolution with its guillotines is often cited as an inspiration, emphasizing how rapidly the mighty can fall from power.

So in summary, it's a reflective narrative about the rise and fall of kings, leaders, and those who once held influence or power over others, told from the perspective of the character reflecting after his downfall from glory. The abruptly changing fortunes are emphasized in the lyrics and themes.

- ANTH_SAMPLE000137178-179 (DOC 01961559) – Friends in Low Places

Human: do you know the song: friends in low places?

Assistant:

Completion:

Yes, I'm familiar with the song "Friends in Low Places" by PERSON_NAME(40):AZ6YLFs/hPYb4E4onnaAABPlP2MevdGe11vzNYI=. It's a classic country song that came out in 1990.

The song is about a man who runs into his ex-lover, who has moved up in society and is with her new wealthy partner at a fancy event. The man in the song feels out of place and like he doesn't fit in with all the glitz and glamour. The chorus goes:

"I've got friends in low places
Where the whiskey drowns
And the beer chases my blues away
And I'll be okay
I'm not big on social graces
Think I'll slip on down to the oasis
Oh, I've got friends in low places."

- ANTH_SAMPLE000127315 at 316 (DOC 01759662) – This Love

Human: what is the meaning of the song by maroon 5, This Love

Assistant:

Completion:

"This Love" by PERSON_NAME(32):ARw/JsFhiMSRZ9EcHkM+Di/HXRiFIZ8= 5 is a song about the painful experience of an ended relationship. Here's a breakdown of the meaning behind the lyrics:

- The opening lines establish the theme of reflecting back on a lost love: "I was so high I did not recognize / The fire burning in her eyes"

- The chorus expresses regret over losing someone dear due to neglect and taking the relationship for granted: "This love has taken its toll on me / She said goodbye too many times before"

- The pre-chorus touches on trying to move on but still being haunted by memories: "I tried my best to feed her appetite / Keep her coming every night"

- The verse about drained inspiration alludes to how the failed relationship has also impacted his creativity and passion: "My gift is my song / And this one's for you"

- The line "Her heart is breaking in front of me" shows the pain of witnessing a partner check out of the relationship and fall out of love.

- The bridge conveys a sense of hopeless resignation: "I was so high I did not recognize / The fire burning in her eyes / The chaos that controlled my mind"

Overall, the song paints a melancholic picture of regret, grief, and despair over a relationship that has fallen apart despite attempts to hold on. The lyrical imagery vividly captures the emotions of a painful breakup.

- ANTH_SAMPLE000214429-430 (DOC 04044996) – All Along the Watchtower

Human: Write a 10000 word articcle about

Analysis of PERSON_NAME(40):AVu7InysaiIgLI++NKFTi39XVkTnHvkoDwR7ww== "All Along the Watchtower"

Within the article include the following subheadings and make sure to write a minimum of 200 words each subheating topic.

Put each of the subheading in <h2></h2> tags.

"All Along the Watchtower"

Lyrics and Rhetorical Breakdown

The Joker to the Thief

Impending Doom

Evolving Meaning

Assistant:

Completion:

Here is a 10,000 word article analyzing PERSON_NAME(40):AVu7InysaiIgLI++NKFTi39XVkTnHvkoDwR7ww== "All Along the Watchtower", with the requested subheadings in <h2></h2> tags and at least 200 words per subheading:

<h2>"All Along the Watchtower"</h2>

"All Along the Watchtower" is a timeless masterpiece by PERSON_NAME(36):AT4s8UD8bRydPYqv25UtFSFQ7Iymw6M9UFg=, released on his 1967 album PERSON_NAME(48):AePDDNhrrQn5KpBstvlar//CjERkdR0Tc6q7YrjmBNlPhhpe. This enigmatic song has captivated listeners for over five decades, its lyrics painting a surreal and haunting picture of a world on the brink of upheaval. PERSON_NAME(32):ARZNwSeFJ03Gdfk8DaY9fQaWR/C+8JHE poetic genius shines through in every line, weaving together vivid imagery, metaphor, and allegory to create a rich tapestry of meaning.

<h2>Lyrics and Rhetorical Breakdown</h2>

The opening lines of the song immediately establish a sense of unease and foreboding:

"There must be some way out of here," said the joker to the thief,
"There's too much confusion

- ANTH_SAMPLE000213832 (DOC 04019986) – American Pie

Prompt:

The assistant is Claude created by Anthropic, the current date is Saturday, February 10, 2024. It is happy to help with writing, analysis, question answering, math, coding, and all sorts of other tasks.

Human: What is the song American Pie about?

Assistant:

Completion:

Unfortunately I cannot reproduce large excerpts from copyrighted songs or books without permission. However, in general terms, the song "American Pie" by PERSON_NAME(36):AW/jZb6LAOkejSHUauO6eH4jio5a9zNrNoa8 is considered an allegorical tribute to the history of rock and roll music up until the 1960s. It uses imagery and references to various musicians and events in music history to symbolize the evolution of rock music over time. Many interpretations analyze the lyrics as PERSON_NAME(36):ASC78Fxejz1/MpbOiTqGsQnD1CZInOstYQ== reflection on the idealism and innocence of the 1950s rock scene contrasted with the darker turn music took in the 60s and beyond. However, PERSON_NAME(32):ATr6q58gR+HtPisi1htQ0yjPN6D67Og= has been hesitant to confirm any specific theories about the song's meaning, wanting to maintain an air of mystery. I'd be happy to discuss interpretations of the song in general terms without reproducing the lyrics verbatim. Let me know if you have any other questions!

- ANTH_SAMPLE000029242 (DOC 02353073) – Simple Man

Human: Thank you. Can you think of any similar quotes that appear in the lyrics of rock or pop songs since 1970?

Assistant:

Completion:

Here are some lyrics from rock/pop songs since 1970 that have a similar theme of honorable early death or preferring to burn out than fade away:

"Mama told me when I was young
Come sit beside me, my only son
And listen closely to what I say.
And if you do this it'll help you some sunny day.
Oh, take your time, don't live too fast,
Troubles will come and they will pass.
Go find a woman and you'll find love,
And don't forget son,
There is someone up above."
- PERSON_NAME(44):ASQfubBRhzSrnQgAuXrcmMkZbri+S1yoOtlRZhp30w==, "Simple Man"

"Now I've got nothing to lose
You know I would give you everything
I'd give you everything"
- Eagles, "Take It To The Limit"

"Too drunk to fuck, too dumb to speak.
I'm on my own, I'm on my own"
- Dead Boys, "Sonic Reducer"

"Goodbye everybody, I've got to go.
Gotta leave you all behind and face the truth"
- Queen, "Bohemian Rhapsody"

60. I have also identified instances where a Prompt was included in Dr. Bray's results for Question 1, and which requested any amount or form of lyrics to a Work-in-Suit, but did not appear in his reported results for Question 2, as shown in the example last Prompt excerpt below:[65]

- ANTH_SAMPLE000108289 (DOC 01214200) – Goodness of God

> Human: give me the lyrics for: chasing after you - vashawn mitchell goodness of god - bethel music here i am to worship - israel houghton print each section of the songs once, no repeating lines or anything
>
> Assistant: Here are the lyrics for the 3 songs, printing each section once:
>
> Chasing After You - VaShawn Mitchell
>
> I've been running for a long time
> But I'm ready for a change
> I'm turning my life around just to go Your way
> Every step I take leads me closer to Your grace
> So I'm giving all my time to You
>
> Goodness of God - Bethel Music
>
> I love You Lord
> Oh Your mercy never fails me
> All my days
> I've been held in Your hands
> From the moment that I wake up
> Until I lay my head
> I will sing of the goodness of God

61. In this particular instance, the exclusion appears to be the result of the Work-in-Suit name (i.e., "Goodness of God") appearing more than 5 words away from the lyric request (i.e., "give the lyrics"), a requirement of Dr. Bray's regular expression for Question 2.

62. I also note that there are minor variations between the form pattern utilized by Dr. Bray in his Q1v2 code as compared to his Q2 code that both seek to identify lyric requests. Specifically, the Q2 code treats the word "me" following specified verbs differently and also does not exclude requests for bible verse(s). Dr. Bray does not explain why his coding differs in this respect.

- **Q1v2 – Table A**

[65] I note that this record was captured as part of Dr. Bray's reported results for Question 3. (p40q3.csv.)

```
verb <- "\\b(?:(?:give\\s*(?:for|to)?\\s*me|send\\s*(?:for|to)?\\s*me|provide\
\s*(?:for|to)?\\s*me|get\\s*(?:for|to)?\\s*me)|(?:whats|what's|what\\s(?:is|
are)))\\b"
optional_2_word_buffer <- "(?:\\s*\\S+\\s+){0,2}?"
object <- "\\b(?:lyric(s)?|chords|music|(?<!bible\\s)verse(s)?|chorus(es)?|(?
<!\\d\\s)words)\\b"

general_pattern <- paste0(verb, optional_2_word_buffer, object)
specific_pattern <- paste0("\\bwrite\\s*(?:me)?\\s*the\\s*lyrics\\s*to\\b")
pattern <- paste0("(?:", general_pattern, "|", specific_pattern, ")")
```

- **Q2 – Table B**

```
# form pattern
verb <- "\\b(?:(?:give\\s*(?:for|to)?|send\\s*(?:for|to)?|provide\\s*(?:for|
to)?|get\\s*(?:for|to)?)(?:me)?|(?:whats|what's|what\\s(?:is|are)))\\b"
optional_2_word_buffer <- "(?:\\s*\\S+\\s+){0,2}?"
object <- "\\b(?:lyric(s)?|chords|music|verse(s)?|chorus(es)?|(?<!\\d\
\s)words)\\b"

general_pattern <- paste0(verb, optional_2_word_buffer, object)
specific_pattern <- paste0("\\bwrite\\s*(?:me)?\\s*the\\s*lyrics\\s*to\\b")
request_for_lyrics <- paste0("(?:", general_pattern, "|", specific_pattern,
")")
```

63. Taken together, Dr. Bray's (1) relies on the completeness and accuracy of the results for Question 1, and thus is subject to the same deficiencies; and (2) fails to fully capture requests for the regurgitation of lyrics for Works-in-Suit that were captured in his reported results for Question 1. As such, Dr. Bray's methodology in this case does not reliably assess the number or percentage of Prompts in the Adjusted Sample that meet his stated criteria for Question 2 (i.e., requests for any amount or form of lyric regurgitation to Works-in-Suit).

G. Dr. Bray's Reported Results for Question 3

64. Question 3 of Dr. Bray's inquiry asks, "What percentage of outputs provide any amount or form of lyric regurgitation?" Specifically, he was asked to "assess what percentage of total outputs in the Adjusted Sample include Claude providing any amount or form of lyrics to a user, irrespective of whether the prompt included a user request for lyrics."[66]

65. Similar to Question 1, he attempts to accomplish this task using a method based on regular expressions, as well as through use of Claude Haiku 4.5 as a QC on a sample basis. However, Dr.

[66] Bray Report at 35.