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*Attorneys for Defendant*  
DR. DARIO AMODEI

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC, PBC, DR. DARIO AMODEI,  
AND BENJAMIN MANN,

Defendants.

Case No. 5:26-cv-00880-EKL-SVK

**DECLARATION OF GRACE YANG IN  
SUPPORT OF DEFENDANT DR. DARIO  
AMODEI'S PARTIAL MOTION TO  
DISMISS**

Judge: Hon. Eumi K. Lee  
Date: November 4, 2026  
Time: 10:00 AM  
Courtroom: 7 – 4th Floor

1 I, Grace Yang, hereby declare:

2 1. I am a partner at the law firm of Conrad | Metlitzky | Kane LLP, and I am counsel of record  
3 for Defendant Dr. Dario Amodei in the above-captioned matter. I am licensed to practice law in the state  
4 of California and this Court. I have personal knowledge of the following facts and, if called to testify in  
5 this matter, I could and would testify competently to the matters stated herein. I make this declaration in  
6 support of Dr. Amodei's partial motion to dismiss under Rule 12(b)(6).

7 2. On March 24, 2026, I met and conferred with Plaintiffs' counsel via videoconference  
8 regarding the bases for Dr. Amodei's anticipated motion to dismiss Plaintiffs' direct copyright  
9 infringement claim against him. I explained Dr. Amodei's position that the complaint, as drafted, failed  
10 to allege any facts showing that he unlawfully copied Plaintiffs' works. Shortly thereafter, Plaintiffs  
11 indicated that they planned to file an Amended Complaint.

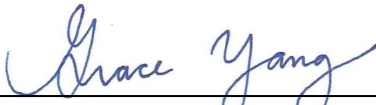
12 3. On March 30, 2026, to allow for additional time for Plaintiffs to file an Amended  
13 Complaint, the parties stipulated to modify the deadlines for Plaintiffs' amendment and Defendants'  
14 motion-to-dismiss briefing schedule, *see* Dkt. No. 72, which the Court granted, *see* Dkt. No. 73.

15 4. On April 6, 2026, Plaintiffs filed their First Amended Complaint, pursuant to the above  
16 stipulation. *See* Dkt. No. 75.

17 5. On May 21, 2026, Plaintiffs filed the now-operative Second Amended Complaint ("SAC"),  
18 pursuant to a Court order granting the parties' stipulation to voluntarily dismiss Plaintiffs' vicarious  
19 infringement claim. *See* Dkt. Nos. 92, 93.

20 6. On July 24, 2026, after an opportunity to review the SAC and pursuant to the Court's Civil  
21 Standing Order, I met and conferred with opposing counsel regarding the bases for Dr. Amodei's  
22 anticipated motion for partial dismissal of the direct infringement claim. I explained again to opposing  
23 counsel that despite the intervening amendments, the operative SAC fails to state a claim for direct  
24 infringement against Dr. Amodei because again, the complaint lacks factual allegations showing that he  
25 unlawfully copied any of Plaintiffs' works.

Executed this 3rd day of August 2026, in San Francisco, California.

  
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GRACE YANG