

SONAL N. MEHTA (SBN 222086)
sonal.mehta@wilmerhale.com
**WILMER CUTLER PICKERING
HALE AND DORR LLP**
2600 El Camino Real, Suite 400
Palo Alto, CA 94306
Telephone: (650) 858-6000

Attorneys for Defendant
ANTHROPIC PBC

LOUIS W. TOMPROS (*Pro Hac Vice*)
louis.tompros@wilmerhale.com
**WILMER CUTLER PICKERING
HALE AND DORR LLP**
60 State Street
Boston, MA 02109
Telephone: (617) 526-6000

ARI HOLTZBLATT (SBN 354361)
ari.holtzblatt@wilmerhale.com
ROBIN C. BURRELL (*Pro Hac Vice*)
robin.burrell@wilmerhale.com
**WILMER CUTLER PICKERING
HALE AND DORR LLP**
2100 Pennsylvania Ave, NW
Washington, DC 20037
Telephone: (202) 663-6000

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,
Plaintiffs,

v.

ANTHROPIC PBC, ET AL.,
Defendants.

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

**DECLARATION OF SARAH
RODRIGUEZ IN SUPPORT OF
ANTHROPIC'S POSITION IN JOINT
DISCOVERY DISPUTE STATEMENT
REGARDING ANTHROPIC'S
PRESERVATION OF PROMPT AND
OUTPUT RECORDS**

Magistrate Judge Susan van Keulen

PUBLIC REDACTED VERSION

1 I, Sarah Rodriguez, declare the following:

2 1. I am Legal Operations Specialist at Anthropic PBC ("Anthropic"). I have personal
3 knowledge of the matters stated in this declaration, and if called as a witness, I could and would
4 competently testify to them.

5 2. I submit this declaration in support of Anthropic's portion of the Parties' Joint
6 Discovery Dispute Statement Regarding Anthropic's Preservation of Prompt and Output Records,
7 filed concurrently herewith.

8 3. In my role with Legal Operations at Anthropic, I am responsible for assisting the
9 legal team with the managing ongoing preservation of documents and data in connection with
10 litigation involving the company. I work closely with the technical staff at Anthropic including
11 engineers who assist with the technical aspects of preservation of ESI. In this role, I am personally
12 familiar with Anthropic's costs for data storage and processing.

13 4. The data in the prompt and output snapshots captured from Anthropic's Claude.ai
14 and first-party Claude API interfaces on a 14-day cadence between January 13, 2026 and March
15 24, 2026 comprises approximately [REDACTED]

16 [REDACTED].

17 5. Capturing the data for that two-month period cost approximately \$1.7 million in
18 compute and retrieval costs. The ongoing storage cost for [REDACTED] is approximately
19 \$233,300 per month. The storage costs comprise Google Cloud Storage fees at the Coldline rate of
20 [REDACTED] stored, which covers ~78% of monthly storage costs, plus initial backup
21 retention, which covers ~12% of monthly storage costs.

22 6. To run search terms over a set of [REDACTED], Anthropic would first need to
23 process the data in those snapshots. The estimate of the cost to process the data in [REDACTED]
24 [REDACTED] is over \$2,000,000. Processing the data entails retrieving the preserved snapshots from
25 cold storage and transferring them to a hot storage system, leveraging compute resources to
26 decrypt and deduplicate each row, and dedicating engineering hours to build, run, and maintain
27 the query pipelines.
28

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.

Date: July 6, 2026

/s/ Sonal N. Mehta
Sonal N. Mehta