EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL., Plaintiffs, v. ANTHROPIC PBC, Defendant.	Case Number 5:24-cv-03811-EKL SVK

HIGHLY CONFIDENTIAL--ATTORNEYS' EYES ONLY

VIDEOCONFERENCED and VIDEO-RECORDED

30(b)(1) DEPOSITION of

DANIELA AMODEI

San Francisco, California 94111

Wednesday, November 12, 2025

Reported Stenographically by:
MARY J. GOFF
CSR No. 13427
WA CSR No. 21030779
Job No. 606060
PAGES 1-372

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VIDEOCONFERENCED and VIDEO-RECORDED DEPOSITION of DANIELA AMODEI, Volume I, taken on behalf of Plaintiff Publishers, Oppenheim + Zebrak, LLP, at WilmerHale, 50 California Street, Suite 3600, San Francisco, California 94111, beginning at 9:07 a.m. and ending at 6:11 p.m., on Wednesday, November 12, 2025, before MARY J. GOFF, California Certified Shorthand Reporter No. 13427 and WA CSR No. 21030779.

APPEARANCES:

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ALSO PRESENT: Natalie Naugle, In-house counsel Anthropic

Videographer: Philip Astor

San Francisco, California

Wednesday, November 12, 2025

9:07 a.m.

THE VIDEOGRAPHER: Here begins Media Number 1 in the videotaped deposition of Daniela Amodei, in the matter of Concord Music Group, versus Anthropic, in the United States District Court, Northern District of California, San Jose Division, Case Number 24-CV-03811-EKL (SVK). 09:07:07 09:07:09 09:07:13 09:07:17 09:07:18 09:07:21

Today's date is November 12, 2025. The time on the video monitor is 9:07 a.m. 09:07:29 09:07:33

The videographer today Phillip Astor, representing Planet Depos. This video deposition is taking place at WilmerHale Cutler Pickering Hale and Dorr LLP, San Francisco, California. 09:07:37 09:07:39 09:07:42 09:07:44

Would counsel please voice identify themselves and state whom they represent. 09:07:48 09:07:50

ATTORNEY HAILEY: Nick Hailey, with the law firm Oppenheim + Zebrak, on behalf of the Plaintiff Music Publishers. 09:07:52 09:07:53 09:07:56

I'm joined by my colleague, Tim Chung. 09:07:58

ATTORNEY MEHTA: Sonal Mehta, from WilmerHale, on behalf of Anthropic and the witness. 09:08:03 09:08:04

And with me is Natalie Naugle, who is in-house counsel at Anthropic. 09:08:06 09:08:08

THE VIDEOGRAPHER: The court reporter today Mary Goff, representing Planet Depos. The witness will now be sworn. 09:08:12 09:08:12 09:08:15

THE COURT STENOGRAPHER: My name is Mary Goff. I am a California Certified Shorthand Reporter, CSR Number 13427. Today's proceedings are being captured by stenographic means. 09:08:17 09:08:17 09:08:17 09:08:17

DANIELA AMODEI, 09:08:17

Being first duly sworn or affirmed to testify to the truth, the whole truth, and nothing but the truth, was examined and testified as follows: 09:08:17 09:08:17 09:08:17

EXAMINATION 09:08:17

BY ATTORNEY HAILEY: 09:08:17

Q Good morning, Ms. Amodei. 09:08:36

A Good morning. 09:08:38

Q My name is Nick Hailey. I'm an attorney representing the Plaintiff Music Publishers in this case. 09:08:39 09:08:40 09:08:43

We met for a few -- the first time just a few moments ago. 09:08:43 09:08:45

First of all, thank you very much for taking the time today to answer my questions. 09:08:47 09:08:49

A You're welcome. 09:08:52

Q Can you go ahead and state your name and address for the record? 09:08:53 09:08:55

OpenAI. 09:45:53

What were your roles and responsibilities as engineering manager? 09:45:53

A I partnered with a technical leader. I was the people manager of that team. And I was responsible for helping to hire and recruit staff to that team and to help project manage some of the initiatives that we were working on at OpenAI. 09:45:55 09:45:59 09:46:02 09:46:06 09:46:14 09:46:19

Q Anything else? 09:46:22

A I also oversaw the manager of a technical team called interpretability, and he managed his team. 09:46:22 09:46:31 09:46:36

Q Anything else? 09:46:37

A I don't believe so. Oh, sorry. 09:46:39

Just to clarify: This is just in the technical manager role, not the people role. 09:46:42 09:46:46

Q The engineering manager role? 09:46:48

A Yes. 09:46:50

Q Who was the technical leader that you partnered with? 09:46:51 09:46:53

A I'm sorry. I actually have a privilege question. 09:46:56 09:46:58

Q And let me just clarify. 09:47:05

You can confer with your counsel, but it's a privilege question as to a response to the 09:47:08 09:47:12

question that I just asked, which is: Who was the technical leader that you partnered with? 09:47:13 09:47:16

A I have a general question about what I can disclose about my time at OpenAI, given an agreement I have with OpenAI. 09:47:18 09:47:21 09:47:26

ATTORNEY MEHTA: I need to be consult with her about that, so let's go off the record and we'll do that. 09:47:28 09:47:29 09:47:32

THE VIDEOGRAPHER: We are going off the record at 9:47 a.m. 09:47:34 09:47:34

(A break was taken from 9:47 a.m. to 9:49 a.m.) 09:47:36 09:49:14

THE VIDEOGRAPHER: We are back on the record at 9:49 a.m. 09:49:18 09:49:18

Q (BY ATTORNEY HAILEY) Ms. Amodei, did you have an opportunity to confer with your lawyer? 09:49:22 09:49:23

A I did. 09:49:27

Q Let me re-ask my question. 09:49:29

Who was the technical leader at OpenAI that you partnered with as engineering manager? 09:49:35 09:49:38

A So when I departed OpenAI, I signed some paperwork, including a nondisclosure agreement. And I am -- unfortunately, because I don't have the document in front of me, I'm not sure what I am allowed to discuss from my tenure at OpenAI and what 09:49:42 09:49:49 09:49:51 09:49:53 09:49:57

I'm not allowed to discuss, so I'm not sure if I am allowed to answer that question. 09:50:02 09:50:07

Q Do you have -- do you have access to that OpenAI agreement that you referenced? 09:50:09 09:50:11

A I might be able to find it. I don't have it in front of me. I would have to contact the attorney that we worked with in order to get that document. 09:50:15 09:50:18 09:50:21 09:50:24

Q And you didn't review that OpenAI agreement in advance of the deposition today? 09:50:24 09:50:28

A I did not. 09:50:32

Q And your testimony is that it's a nondisclosure agreement? 09:50:33 09:50:41

A To be honest, I don't remember the paperwork that we signed. It was about five years ago now. 09:50:45 09:50:46 09:50:50

But because I'm not sure, I'm just unsure what I'm able to answer specifically about my time at OpenAI and what I'm not able to answer about my time at OpenAI. 09:50:52 09:50:56 09:50:59 09:51:03

And I would want to confer with the counsel that we worked on that agreement with just to make sure that I'm not waiving privilege. 09:51:05 09:51:07 09:51:10

Q So I'm going to continue to ask my questions about OpenAI, and you should answer to the 09:51:13 09:51:14

extent that you are able.

And if you are not answering because you believe that you are precluded or have questions based on your nondisclosure agreement, then I just ask that you be clear in your responses as to whether you are fully answering my questions or not answering my questions.

Can you do that?

A So I'm just -- I would hate to not answer your questions if I'm able to, but I just -- I don't know. And I don't remember what was in the specific -- like, we signed a few different documents upon departure at OpenAI, and because I don't have the documents in front of me, I'm not sure what I'm able to answer and what I'm not able to answer.

So I could -- you know, we could find those documents or I probably would just say I don't know if I can answer that question.

ATTORNEY MEHTA: One suggestion I have is if there's something that's public -- so if he shows you document or a public statement or something -- that I think you can probably speak to pretty comfortably, and that may allow Mr. Hailey to ask questions about public information.

And then to the extent there's something that is not public and you're not sure, then you can just let him know that you're not sure. 09:52:20 09:52:21 09:52:23

THE DEPONENT: Okay. 09:52:25

Q (BY ATTORNEY HAILEY) Let me ask you this, Ms. Amodei: You mentioned that you signed a few different agreements with OpenAI. 09:52:27 09:52:28 09:52:31

One of those agreements was a nondisclosure agreement; is that right? 09:52:33 09:52:35

A I don't know. 09:52:37

Q What else do you remember about what specific agreements you signed with OpenAI? 09:52:38 09:52:39

A I don't know. And I'm imagining that if the attorney that we worked with on that case were here, he would instruct me to not answer that based on the grounds of privilege, but I -- but I don't know. I'm not -- I'm not a lawyer. 09:52:44 09:52:46 09:52:50 09:52:53 09:52:55

Q So I would ask that during the next break you try to track down those agreements, because I'm going to continue with my questions. I would like you to answer them to the best of your ability consistent with what you think your legal obligations are. 09:52:57 09:53:00 09:53:06 09:53:08 09:53:13 09:53:15

If we can't get the answers to the questions today because you don't know what those 09:53:16 09:53:18

legal obligations are, we will reserve the right to come back and ask those questions at a later time. 09:53:21 09:53:24

ATTORNEY MEHTA: And we will reserve the right to oppose that. 09:53:26 09:53:27

Q (BY ATTORNEY HAILEY) So let me continue. We were talking about your roles and responsibilities as -- as engineering manager at OpenAI. 09:53:30 09:53:34 09:53:37 09:53:39

Let me ask you now, Ms. Amodei: What were your roles and responsibilities as VP of people at OpenAI? 09:53:41 09:53:43 09:53:47

ATTORNEY MEHTA: Oh, sorry. Just one quick thing. I think the mic is muted, so can we unmute the audio, please. 09:53:47 09:53:50 09:53:53

A I'm sorry. Could you repeat the question? 09:53:56

Q (BY ATTORNEY HAILEY) What were your roles and responsibilities as VP of people at OpenAI? 09:53:59 09:53:59

A I oversaw -- apologies. It was a while ago, so I'm going to do my best to -- to recollect exactly what teams I oversaw. 09:54:02 09:54:07 09:54:11

But I helped to incubate and grow the recruiting function. I worked closely on a number of, you know, special people projects. And I incubated a team called business operations in my time there. 09:54:13 09:54:16 09:54:19 09:54:24 09:54:29

of that equity, right? 10:07:31
ATTORNEY MEHTA: Asked and answered 10:07:33
multiples times? 10:07:34
A I don't think I have anything else to add 10:07:35
to my prior testimony. 10:07:36
Q (BY ATTORNEY HAILEY) Ms. Amodei, why did 10:07:41
you leave OpenAI? 10:07:42
A I'm not sure that I am allowed to disclose 10:07:49
specific details about why I left OpenAI due to 10:07:53
privilege. 10:07:56
Q So I'm not asking any questions about 10:07:59
discussions that you had with lawyers. 10:08:02
I'm asking: When you left OpenAI in 10:08:06
December 2020, what were your reasons for leaving 10:08:11
OpenAI, Ms. Amodei? 10:08:16
A My cofounders and I felt that we wanted to 10:08:18
start a new endeavor what was focused on developing 10:08:22
AI technology in our own desired style and fashion. 10:08:28
Q Did you have any concerns about how OpenAI 10:08:37
was developing AI technology? 10:08:42
A I am genuinely not sure if I am allowed to 10:08:50
ask -- answer that question due to the documents 10:08:55
that we have already discussed that I signed with 10:08:56
OpenAI when I departed. 10:09:00
I would need to review those documents to 10:09:02

ensure I wasn't waiving privilege before answering that. 10:09:04 10:09:08

Q So when you say that your "Anthropic cofounders and you felt that you wanted to start a new endeavor that was focused on developing AI technology in your own desired style and fashion," does that mean that the way OpenAI was developing AI technology at that time was not to your desired style or fashion? 10:09:08 10:09:10 10:09:13 10:09:16 10:09:19 10:09:24 10:09:26

ATTORNEY MEHTA: And I'm going to caution the witness. You can answer that consistent with whatever your confidentiality obligations are to OpenAI. 10:09:28 10:09:29 10:09:34 10:09:37

A I think what I feel comfortable sharing is that, you know, my cofounders and I felt that we were developing -- you know, we wanted to develop AI technology in a way that was just little bit different focus in terms of what we hoped the technology would do and how we wanted to run the organization. 10:09:39 10:09:43 10:09:47 10:09:53 10:09:57 10:10:00 10:10:02

But I don't really feel comfortable getting into specifics of conversations we had with OpenAI at that time because of the reasons we have talked about. 10:10:04 10:10:06 10:10:09 10:10:12

Q (BY ATTORNEY HAILEY) Because you don't 10:10:13

Your suggestion that I was doing anything to pressure the witness is completely out of line. 06:10:40 06:10:42

The video transcript -- the video from today and the transcript from today will reflect that I conducted myself completely appropriately, and your suggestion to the contrary is what's improper. 06:10:44 06:10:47 06:10:50 06:10:53 06:10:57

I think the record will also reflect that we gave the witness more than enough time to review the documents. We spent an unbelievable amount of time on the record today with the witness reading through documents. 06:10:58 06:10:59 06:11:02 06:11:05 06:11:08

So I -- 06:11:09

ATTORNEY MEHTA: We have your explanation for the record. Thank you. 06:11:10 06:11:11

I don't remember if I did this earlier, but I want to mark the transcript "Highly Confidential-Attorneys' Eyes Only." 06:11:13 06:11:14 06:11:20

And we should let Ms. Amodei go to see her children. 06:11:21 06:11:24

A Thank you. 06:11:25

THE VIDEOGRAPHER: Please stand by. 06:11:25

This marks the end of the deposition of Daniela Amodei. We were going off the record at 18:11 p.m. (TIME NOTED: 6:11 p.m.) 06:11:27 06:11:28 06:11:31

I, MARY J. GOFF, CSR No. 13427, Certified Shorthand Reporter of the State of California, certify;

That the foregoing proceedings were taken before me at the time and place herein set forth, at which time the witness declared under penalty of perjury; that the testimony of the witness and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed under my direction and supervision; that the foregoing is a full, true, and correct transcript of my shorthand notes so taken and of the testimony so given;

That before completion of the deposition, review of the transcript ( ) was (XX) was not requested: ( ) that the witness has failed or refused to approve the transcript.

I further certify that I am not financially interested in the action, and I am not a relative or employee of any attorney of the parties, nor of any of the parties.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct, dated this 17th day of November, 2025.

Mary J. Goff
_____
MARY J. GOFF