Exhibit 16



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Transcript of Abhishek Nagaraj

Date: March 4, 2026
Case: Concord Music Group -v- Anthropic

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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

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VIDEOCONFERENCED and VIDEO-RECORDED
DEPOSITION of
ABHISHEK NAGARAJ, Ph.D.
San Francisco, California 94111
Wednesday, March 4, 2026

Reported Stenographically by:
MARY J. GOFF
CSR No. 13427
WA CSR No. 21030779
Job No. 620602
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VIDEOCONFERENCED and VIDEO-RECORDED DEPOSITION of ABHISHEK NAGARAJ, Ph.D., Volume I, taken on behalf of Plaintiff Music Publishers, Oppenheim Zebrak, LLP, at WilmerHale, 50 California Street, Suite 3600, San Francisco, California 94111, beginning at 9:17 a.m. and ending at 6:52 p.m., on Wednesday, March 4, 2026, before MARY J. GOFF, California Certified Shorthand Reporter No. 13427 and WA CSR No. 21030779.

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these estimates to determine how much Anthropic should pay to gain access to otherwise unavailable training data"?
Do you see that?
A I do see that, yes.
Q At the time this spreadsheet -- spreadsheet was created, do you know whether Anthropic already had access to Plaintiffs' song lyrics in its training data?
A I don't know precisely the timing of when the spreadsheet was created and neither do I know precisely what training data Anthropic exactly had access to all.
All I'm aware of is, as of the present day, Anthropic's training data was a vast and diverse set of data, including data scraped from the Internet.
Q [redacted]
ATTORNEY HOLTZBLATT: Objection to form.
A Can you repeat that question?

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Q (BY ATTORNEY MILLER) If this spreadsheet [redacted]
ATTORNEY HOLTZBLATT: Object to form.
A I don't necessarily want to speculate [redacted] So in that sense I don't want to really speculate on your -- on your question because I don't know the answer to that.
Q (BY ATTORNEY MILLER) Are you aware of any [redacted]

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[redacted]
A I did not rely on just the spreadsheet for my conclusion that the value of song lyrics to Anthropic is low. In fact, there are many properties of song lyrics themselves that help figure -- figure out what that value is.
In particular, both Dr. Bilmes's opinion in this matter was informative, as well as Dr. Kaplan's testimony. In particular, I direct your attention to Point 57 where Dr. Bilmes opined that:
"Lyrics are themselves not a diverse dataset because they tend to be short on facts, repetitive, and limited in their vocabulary. They also tend to include a far narrow range of topics which minimizes the diversity that they can contribute."
And we already know about the use cases. In order for advanced general-purpose LLMs to respond to generalized questions, that is, give answers that are themselves diverse in the topics they address, it requires a highly varied dataset

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and cannot rely on any one type of data for training.
So these opinions are not about the relative importance of lyrics, given that they existed or did not exist in the training data. They're about lyrics themselves as a form of data and -- and -- and the role that they play in shaping value. Right. And --
THE COURT STENOGRAPHER: Wait.
A -- so that is also very informative in my view, that song lyrics have low value when it comes to training general-purpose LLMs.
Q (BY ATTORNEY MILLER) Turn to paragraph 74. In paragraph 74, you state:
"I'm aware of the existence of certain agreements to license music for training data in certain LLMs."
Do you see that?
A I do see that, yes.
Q But then you conclude that the existence of these agreements does not affect your opinion, right?
A I say:
"Based on my review of these deals, the existence of these

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data to train -- all the data needed to train an LLM or the market for lyrics to train an LLM does not exist.

So in that sense insofar as that market does not exist and the effect of the use has no effect on a -- on a nonexisting market, any downstream consequences would also not occur because this market, to start off with, does not exist in some ways.

Q Yeah, as we have discussed, you concluded that single-purpose LLMs' licenses for Plaintiffs' copyrighted works doesn't affect the market for general-purpose LLMs' use of the copyrighted works.

What about the reverse of that? Do you think general-purpose LLMs' use of copyrighted works as training data has any effect on single-purpose LLMs' markets?

A I didn't hear the first part of your question. It was not loud enough. Can you repeat that?

Q Sure.

A Repeat the whole question, please.

Q Yeah, sure.

We discussed earlier your opinion that the license to single-purpose LLMs have reached for use

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of Plaintiffs' copyrighted works doesn't affect any market for general-purpose LLMs' use of the same works. And I'm asking you about the reverse.

Do you think general-purpose LLMs' use of Plaintiffs' copyrighted works has any effect on the market for use by single-purpose LLMs?

A No, I do not.

Q Why not?

A I talk about this in -- in my reply report in paragraph 24 where, again, the economics of markets for nonrivalrous goods like licenses to IP, supply constraints are irrelevant. Right. So if one consumer consumes in one market, there's no less to consume in the other market because the marginal cost of reproduction is zero. So that creates one degree of separation between the two markets.

So if I'm a publisher of an eBook, I can produce another copy at not cost. There's no fixed supply of eBooks. As a result, selling to one buyer did not impose any opportunity costs in terms of foregoing sales for another buyer.

In such situations, prices are driven by individual buyer's willingness to pay rather than marginal production cost. So licenses of data will look at how much each buyer values the data when

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setting prices. So as I talked about before, the ways in which Klay and Udio approach their consumers, the kind of product and services that they offer as a single-purpose AI is completely distinct than what a general purpose-AI system offers.

And so for that reason, the prices of the licenses will also be independent, and I don't expect the reverse, as you called it, to occur.

Q So you don't think there's any chance that -- that the next round of licensing negotiations between -- between Plaintiffs and a single-purpose LLM like Udio or Klay, the single-purpose LLM would say, you know: Well, Anthropic uses the -- uses this data for free; why should we have to pay for it?

ATTORNEY HOLTZBLATT: Objection --

A I'm --

ATTORNEY HOLTZBLATT: -- asked and answered.

A -- I'm not -- I'm not able to speculate on what any future licensor will tell Anthropic or any other -- any other person in such a negotiation.

Q (BY ATTORNEY MILLER) You don't think Anthropic's use of Plaintiffs' copyrighted works a

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without license would have any effect on those negotiations?

ATTORNEY HOLTZBLATT: Objection, asked and answered.

A Again, I'm not here to speculate how any future negotiations would go.

Q (BY ATTORNEY MILLER) You agree that you can use Claude to write lyrics, right?

A I believe the Claude system can be used to write original lyrics, although regurgitation of preexisting lyrics is not something you can use it for.

Q And you can prompt Claude to write lyrics in a certain style or on a specific theme and it will produce lyrics in accordance with that prompt, right?

A I believe that's right.

Q Okay. You also agree that generative -- generative AI technology like Claude is continuing to improve?

A I don't have an opinion on that one way or the other. Again, "performance, improvements," these are very difficult terms to define.

Q Would you agree that generative AI models continue to get more powerful?