Exhibit 7



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Transcript of Thomas Turvey, Designated Representative

Date: November 5, 2025
Case: Concord Music Group -v- Anthropic

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION
- - - - - - - - - - - - - x
CONCORD MUSIC GROUP, INC., et al., : Plaintiffs, : Case No. 5:24-cv-03811-EKL
v. :
ANTHROPIC PBC, : Defendant. :
- - - - - - - - - - - - - x

Video-recorded Deposition of
ANTHROPIC PBC
By and Through Its Designated Representative
THOMAS TURVEY
New York, New York
Wednesday, November 5, 2025
9:13 A.M.

H I G H L Y C O N F I D E N T I A L
A T T O R N E Y S' E Y E S O N L Y

Pages: 1 - 135
Reported By: Anita M. Trombetta, RMR, CRR,
California CSR No. 14647

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Videotaped deposition of ANTHROPIC PBC, by and through its designated representative, THOMAS TURVEY, held at the offices of:

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Pursuant to notice, before Anita M. Trombetta, a Certified Shorthand Reporter in the State of California, RMR, CRR, and Notary Public in and for the State of New York.

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positive than others relative to the model's understanding and capabilities.

[redacted]

.

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[redacted]

Q And you --

ATTORNEY TOMPROS: Counsel, sorry for interrupting. Just before I forget, given the

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last couple of exchanges and given that we could potentially have folks joining by Zoom theoretically, I'm going to take the opportunity to mark this transcript highly confidential attorneys' eyes only pursuant to section, I think it's 5.2(b) of the protective order, at least until our period for review is up.

ATTORNEY MATERA: Sounds great.

ATTORNEY TOMPROS: I apologize for interrupting.

ATTORNEY MATERA: Thank you.

[redacted]

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[redacted]

A Um --

ATTORNEY TOMPROS: Sorry. Go ahead. No objection.

[redacted]

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[redacted]

26

[redacted]

Q Do different Anthropic AI models require different types of data?

A That's an interesting question. I'm probably out of my depth, but not to my knowledge.

[redacted]

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[redacted]

Q How much data does Anthropic acquire for a given AI model?

ATTORNEY TOMPROS: I object. Outside the scope.

A Acquire as in commercial terms or acquire broadly, whether there is a commercial deal or not? Is that what you're asking?

Q However you understand the question.

A It varies. Typically, for the large models, it's -- you know, I'm not a researcher, and not my area, but my understanding is it's multiple trillions of tokens for a large model, and the smaller model taking, you know, less but still in the multiple trillions.

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Q Who determines how much data is used to train a given AI model?

A The research team.

Q And does the research team communicate to you their data needs for a given AI model?

A If there is a need that requires a commercial agreement, then they communicate that.

Q To you?

A To me, yeah.

Q Are you involved in that determination in any way, how much an AI model needs data?

A No.

Q Is that determination of how much a given AI model needs data informed by how much data can be acquired?

ATTORNEY TOMPROS: I object. Vague.

You can answer if you understand.

A I'm sorry, can you repeat that?

Q Yeah.

Is the determination of how much a given AI model needs informed by how much data can be acquired?

A Not to my knowledge, I think that there are goals around different kinds of models in

Pages 33-44

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text as opposed to any other kind of data?
ATTORNEY TOMPROS: Object to the form. Vague.
A Okay. Sorry. I misunderstood your question.
Of the amount of data that [redacted], how much of that is human-written? That's the question?
Q Sure.
A Okay. Sorry.
Vast majority.
Q Vast majority.
A Yes.
I thought you were asking something different about the model itself. Okay.
Q Okay. We got there.
So same question: Of the data that Anthropic [redacted] its AI models, how much of that data is derived from copyrighted works?
ATTORNEY TOMPROS: Objection. Vague and outside the scope.
A I -- I'm not a copyright expert, but my estimation would be that it would be the majority.
Q Greater than 50 percent?

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ATTORNEY TOMPROS: Same objection.
A "I don't know" is the answer, but I'm guessing that it's probably the majority, yes.
Q Greater than 75 percent?
ATTORNEY TOMPROS: Same objection.
A I don't know.
Q Does Anthropic have a license to use the data derived from copyrighted works that [redacted] AI training?
ATTORNEY TOMPROS: Objection. Scope. Objection. Vague and calls for a legal conclusion and speculation.
You can answer.
A I'm sorry. One more time?
Q Does Anthropic have a license to use the data that it derives from copyrighted works?
A It --
ATTORNEY TOMPROS: Same objections.
A If is a license is required, we would have a license to use content that [redacted], yeah.
[redacted]
ATTORNEY TOMPROS: Objection. Outside the scope, vague, calls for speculation and calls for a legal conclusion.

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[redacted]
ATTORNEY TOMPROS: Same objections.
[redacted]
ATTORNEY TOMPROS: Same objections.
[redacted]
ATTORNEY TOMPROS: Same objection.
[redacted]
ATTORNEY TOMPROS: Objection. Vague.
[redacted]

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[redacted]
Q Okay. You mentioned a few of these earlier, but what methods does Anthropic use to acquire data to train its AI models?
A What methods?
ATTORNEY TOMPROS: Hold on.
I object to scope.
You can answer.
A I'm sorry, could you just --
Q You mentioned a content acquisition as one method.
Are there any others?
ATTORNEY TOMPROS: I object. Outside the scope.
But I think, you can answer.
A We acquired content from the -- the web, so we -- we would crawl content from the web, in addition to content that is produced by commercial agreements that me or my team would enter into.

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It's a combination.
Q Are you -- you mentioned crawl content from the web.
Are you involved in that process at all?
A No.
Q Of those methods you just described, what is Anthropic's most common method of obtaining data to train its AI models?
ATTORNEY TOMPROS: Object. Vague and outside the scope.
A My understanding is the majority of the content is from crawl, and then we augment from data that my team might acquire.
Q What percentage would you place on that augmentation that you described of the total data that Anthropic acquires?
ATTORNEY TOMPROS: Objection. Vague and scope.
A I don't know the answer to that.
Q Anthropic has never attempted to license song lyrics from plaintiffs in this case, correct?
ATTORNEY TOMPROS: Objection. Vague and scope.
You can answer.
A We have not attempted to license song

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lyrics from the plaintiffs, no.

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ATTORNEY TOMPROS: Objection. Calls for speculation.

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[redacted]

ATTORNEY TOMPROS: Object to the form. Vague.

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[redacted]

ATTORNEY MATERA: Okay. I'd like to introduce an exhibit here.

(Plaintiffs' Exhibit 27, marked for identification.)

Q I'm showing you what has been marked as Plaintiffs' Exhibit 27, which is a document that was produced to us with Anthropic Bates stamp 0000231225.

Mr. Turvey, do you recognize this document?

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A I do not.

Q It appears to be a meeting invitation with the subject, "Tim, Tom, Amit, Catchup on Data Landscape!"

Do you see that?

A Yes.

Q Do you recall -- strike that.

Who do you understand Tim, Tom, and Amit to be?

A Well, Tom I believe is me. Tim, I believe it Tim Palmer. And Amit I have to assume is Amit Desai.

Q Okay. Do you recall receiving this invitation?

A I do not.

Q Okay. It's dated February 29th, 2024, correct?

A It is.

Q And when did you begin working at Anthropic?

A Nine days earlier, so -- February 20th.

Q Any reason to believe that you did not receive this invitation?

A I have no reason to believe it.

Q Okay. You said Tim Palmer.

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Who is that?

A Tim Palmer was a consultant that Anthropic was using for content acquisition prior to me being employed.

Q Consultant from where?

A He was a Google employee and left Google and opened up a consulting firm, is my understanding.

Q So his own proprietary shop?

A Yes.

Q And Amit Desai, who is that?

A Amit was a person working in product when I joined.

Q What is product?

A The product organization.

Q Is that a department internal to Anthropic?

A Yes.

Q The invite says, "Chance to discuss/close out the initial data landscape and explore/discuss topics we may want to continue exploring together."

Do you see that?

A Yes.

Q And then there is a link to what appears

Pages 65-68

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[redacted]

ATTORNEY TOMPROS: Same objection. Vague. You can answer.

[redacted]

ATTORNEY TOMPROS: Objection. Vague. Calls for speculation?

[redacted]

Q Okay. Thank you, Mr. Turvey. We can put that exhibit away.

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ATTORNEY MATERA: I'm going to now introduce Exhibit 30, which is a document produced by Anthropic with the Bates stamps 0000228080. Give you just the native here, and I will drop the Excel into the chat.

(Plaintiffs' Exhibit 30, marked for identification.)

ATTORNEY MATERA: Bear with me one moment while I put it up on Zoom.

Q Okay. Do you see Exhibit 30, sir?

A Yes.

Q Do you recognize this document?

A I do, yes.

Q What is it?

A This is a willingness to pay spreadsheet that articulates a formula for valuing different kinds of content.

Q And is this the same document that you were referring to in your testimony earlier today?

A Yes.

Q Did you create this document?

A I did not create this document, but I did have a hand in editing it from time to time.

Q Okay. Who did create this document?

A That's a good question. "I do not know"

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is the answer, but I -- it is likely one of the custodians here.

Q Custodians, you mean custodians of --

A Of this document, yeah. So it could have been Pranay Sangani. It likely was. Or some of the others there, Tom Brown or Nick Joseph. I think one was the creator, and it was a group effort here.

Q Are there any other custodians of this document that you did not mention?

A None that I can recall.

Q Okay. Do you know when this document was made?

A Not exactly. Hold on. Let me just check my notes. Maybe I've got a date for you.

(Document review.)

No, no, I don't. No. It was shortly after I was employed. So I was a -- my employment began February 20th, 2024. It was week -- in the weeks following.

Q Okay. And this document is used for business purposes, correct?

A It is.

Q Is it still used by Anthropic?

A It's been updated not only with different

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information, but a version of it is still used.

Q Is this the most up-to-date version of the document?

A It is not.

Q Do you know if the most up-to-date version has been produced in this case?

A I do not know.

Q What has been updated on this document?

A Lets see. So from memory, I believe we may have added more formats of content on the left. I believe we may have updated the tokens, the token counts to a newer model. And I believe we updated the amount of spend to create a trillion tokens on the bottom right.

[redacted]

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[redacted]

94

[redacted]

Q All right. Thank you, Mr. Turvey. You can put that document aside.

And if we can turn back to Exhibit 31.

Do you see Exhibit 31 on your screen now, sir?

A Yes.

[redacted]

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[redacted]

Q What is reflected on this spreadsheet or worksheet?

A These are book -- or partners where we may acquire print books or have acquired, one or the other.

Q Who added this information?

A Members of my team.

Q And Panama pipeline, is that a reference to Project Panama?

A It is, yes.

Q What is Project Panama?

A Project Panama is our project to destructively scan print books.

Q What does "destructively scan" mean?

A It means that in the process of scanning a print book, that the binding is chopped and the pages are fed into a scanning machine.

[redacted]

A Let me take a look.

(Document review.)

[redacted]

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[redacted]

Q We will do just a quick example.

Row 4 column F, under "Books purchased to date," it says, [redacted]

Do you see that?

A Yes.

Q Does this mean that Anthropic has purchased, as of when this was entered, approximately [redacted] -- or books from Better World Books?

A Yes, that's what that means.

Q The next sheet is entitled "Panama orders."

Do you see that?

A Yes.

Q And what is reflected on this page?

A So these are what looks like isolated actual orders, versus the pipeline, which may have entities where we haven't closed any business. So these are actual verified orders.

Q Okay. Let's go to the next sheet, "Panama

Pages 109-112

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Number 35. And it bears the Bates stamp Anthropic_0000229152.

(Plaintiffs' Exhibit 35, marked for identification.)

Q Mr. Turvey, have you seen this document before?

A I have.

Q What is it?

A This was a document that I wrote on my seventh day of employment in Anthropic and have updated since related to principles that I wanted to the company to take regarding how we would conduct data partnerships.

Q Did anyone help you write it?

A No.

Q Did you consult with anyone before writing it?

A I did not.

Q Any reason to believe this is not a true and accurate copy of what it purports to be?

A Let me just flip through.

No, no reason to believe.

Q Has anyone else edited this document, to your knowledge?

A It's possible. Because several people

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have access and have edit access, but I don't recall anyone editing this.

Q Who at Anthropic has access to this document?

A I don't have a comprehensive list in my head, but certainly everyone -- every member of my team and multiple executives.

Q Which executives?

A Jared Kaplan, Daniela Amodei, Dario Amodei, Tom Brown, many executives.

Q Is this an official Anthropic policy document?

ATTORNEY TOMPROS: I object. Vague.

A It is my document from my group, so, you know, that's what it is.

Q Does this document guide your acquisition deals?

A Broadly, yes.

Q And who is the intended audience for this document?

A Executives at Anthropic and my team.

Q And is this an operational business document?

ATTORNEY TOMPROS: I object. Vague.

A It's a set of principles for how we would

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approach data partnerships that has both strategy and some operational details in it.

Q Does it still serve that function at Anthropic?

A Yes.

Q Do you know if there is a more up-to-date version of this document?

A I'm not sure what the cutoff date of this was, but I did update it, I would say, minorly in the last couple of months.

Q Do you refer to this document in connection with potential partnership deals?

A Yes, we refer to it as a sort of guiding principles.

Q When was the last time you reviewed this document?

A When I updated it in, I'm going to say, September, potentially.

Q Did you review it in preparation for this deposition?

A I did not.

Q Okay. You can put that document aside for now, Mr. Turvey, but we will look at it again later.

A Yeah.

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ATTORNEY MATERA: I'm now going to introduce what will be Exhibit 36.

Exhibit 36 bears the Anthropic Bates stamp 0000230130.

Q And I will again pull up the native file for this Excel sheet --

(Plaintiffs' Exhibit 36, marked for identification.)

ATTORNEY TOMPROS: You gave me two.

Q -- on Zoom for you to review.

Okay. Mr. Turvey, do you see that on your screen now?

A Yes.

Q Exhibit 36, have you seen this document before?

A I don't think so.

[redacted]

I see the tab that says that.

Q Okay. You do not know what this document is?

A I don't recall ever seeing it before.

Q Do you know what's reflected here?