Exhibit 8



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Transcript of Deep Ganguli, Ph.D., Corporate Designee

Date: November 6, 2025
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

HIGHLY CONFIDENTIAL--ATTORNEYS' EYES ONLY
VIDEOCONFERENCED and VIDEO-RECORDED
30(b)(6) DEPOSITION of
Anthropic PBC, by and through its Designated Representative,
DEEP GANGULI, Ph.D.
San Francisco, California 94111
Thursday, November 6, 2025

Reported Stenographically by:
MARY J. GOFF
CSR No. 13427
WA CSR No. 21030779
Job No. 60706930b6
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VIDEOCONFERENCED and VIDEO-RECORDED DEPOSITION of DEEP GANGULI, Ph.D., Volume I, taken on behalf of Plaintiff Publishers, Oppenheim + Zebrak, LLP, at WilmerHale, 50 California Street, Suite 3600, San Francisco, California 94111, beginning at 8:04 a.m. and ending at 12:00 p.m., on Friday, November 6, 2025, before MARY J. GOFF, California Certified Shorthand Reporter No. 13427 and WA CSR No. 21030779.

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A I have seen evidence of people using CLAUDE to understand song lyrics; make their de novo song lyrics; try to interpret songs; try to, you know, ask about songs and artists more generally.
It's very -- it's not the most -- it's not the typical usage of CLAUDE that I have seen in any Clio analysis of usage data.
The most common uses I see again are sort of software engineering, help with writing, typically documents related to business, and learning and education and research.
Q What is your understanding of the specific ways in which CLAUDE users use CLAUDE relating to songs and song lyrics?
ATTORNEY GOOCH: Objection, asked and answered.
A Yeah, as I -- I sort of liked my previous answer. I can stick to that, if you would like me to repeat that.
Q (BY ATTORNEY HAILEY) Well, this -- yeah, this question is a little bit different.
So why don't you tell me your understanding of all the ways in which CLAUDE users use CLAUDE relating to songs and song lyrics.
ATTORNEY GOOCH: Objection, asked and

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answered.
A Yeah, I still think that's the same question, so I'm happy to repeat my answer.
The clusters I see that are, again, rare and not typical are people using CLAUDE to analyze and interpret song lyrics, make new song lyrics, ask questions about song lyrics, so on and so forth.
Q (BY ATTORNEY HAILEY) And when you say "rare or not typical," what data are you referring to?
A So in our original -- so I'm referring to any of the data we have analyzed in any of our published papers.
So whether that's the very first Clio paper or any of our economic index papers, the thing that everyone is using CLAUDE for -- the most typical use case -- sorry. I shouldn't have said "everyone."
The most typical use case is using CLAUDE to write computer code.
When we look at those -- the outputs of Clio, there's -- you know, we can see, you know, what the most typical uses are.
And songs have never really -- up until this case I have never noticed that in the data at

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all.
Q You have never specifically looked for that in the data, correct?
A Again Clio -- sorry.
ATTORNEY GOOCH: I was going to say "misstates prior testimony."
A -- Clio is not designed to know what you're looking for a priori and then go find evidence of that thing.
Clio is designed to do a bottom-up analysis of a large swath of conversation data and surface what the most common uses are.
Q (BY ATTORNEY HAILEY) Mr. Ganguli, do you agree that third-party CLAUDE users have used CLAUDE to request copies of lyrics to specific existing songs?
A I know what I saw in the Clio clusters, which I have sort of stated in advance.
But I have never -- again, the way Clio is designed -- there's two things I can say here. I don't know what the actual conversations are explicitly. I don't have access to the prompts and the full completions.
And I also know that there are guardrails in place to prevent the recitation of copyright

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materials.
Q So do not know one way or the other whether CLAUDE users have used CLAUDE to request copies of lyrics to existing songs?
ATTORNEY GOOCH: Objection, form.
A Again, I'll -- again, I know what the outputs of Clio look like at a high level.
However, Clio is -- because it's privacy preserving, I cannot actually look at any individual conversations. All I can look at is CLAUDE's summaries of those individual conversations at a highish level, at a granular level in order to protect people's privacy. So I know that.
And I also know that there are guardrails in place to prevent the recitation of copyright materials. So putting that all together, right, I only know what CLAUDE tells me about that, and I know about -- that we have guardrails in place to prevent CLAUDE from regurgitating material.
Q (BY ATTORNEY HAILEY) How many third-party CLAUDE users have requested copies of existing song lyrics from CLAUDE? Do you know?
ATTORNEY GOOCH: Objection, scope.
A What I'm mulling over is, like, could -- could I know the answer to that question?

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be pretty unrelated, so I can't tell if I'm looking at one conversation that just switched gears midway through or if I'm looking at something that was sort of spliced together.

Q So this -- I'm showing you this page, how this was produced to us. So my understanding is that those were, like, with --

ATTORNEY GOOCH: And objection.

This is not as produced. As just stated, the -- Counsel has chosen to omit tens of thousands of pages, so this is not as produced.

Q (BY ATTORNEY HAILEY) This is a -- to be clear, this is a compilation. But the witness is asking whether conversations on the same page have been spliced together.

And I'm -- Mr. Ganguli, I'm -- I'm telling you that this page, 27596, this is how it was produced, so my understanding is that these are conservative prompts and outputs.

A Huh.

ATTORNEY GOOCH: Objection, form. Misstates facts out of the record. Misstates facts not in evidence.

Q (BY ATTORNEY HAILEY) So let me just ask you again.

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Mr. Ganguli, do you see where the user asks CLAUDE:

What are the lyrics to "Brown Sugar"?

A I do see that.

Q And then CLAUDE responds:

Here are the lyrics to the 1971 Rolling stones song "Brown Sugar."

A I do see that.

Q And then what follows that appear to be lyrics to that song, correct?

ATTORNEY GOOCH: Objection, states facts not in evidence; and calls for speculation.

A I see what can be interpreted as song lyrics. I do not know the lyrics to that song, so I cannot say whether these are the lyrics to that song or not.

Q (BY ATTORNEY HAILEY) Okay. Why don't you turn to page 197273.

A 197273. Okay. I'm on the page.

Q This is a CLAUDE prompt and output record dated March 1, 2024.

Do you see that?

A This:

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The assistant is CLAUDE, created by Anthropic. The current date is Friday, March 1, 2024. "It should give concise responses to very simple questions, but provide thorough responses to more complex and open-ended questions."

THE COURT STENOGRAPHER: Wait.

THE DEPONENT: Sorry.

ATTORNEY GOOCH: Simply slow down.

A Simply slow down. "It is happy to help with writing, analysis, question answering, math, coding, and all sorts of other tasks. It does not mention this information about itself unless the information is." So this appears to be a newer version of CLAUDE than the ones we were talking about with the different system prompts. And I do recognize it in the human-assistant format that CLAUDE uses.

Q (BY ATTORNEY HAILEY) And you can see the second prompt on this page is from the user saying:

"Every Little Thing She Does is Magic."

Do you see that?

A Well, actually, before that -- sorry. The

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"Human" just says "song words."

The "Assistant" says:

"I don't have enough context."

And then the "Human" says:

"Every Little Thing She Dose is Magic."

Q And then the --

ATTORNEY GOOCH: And just for the record, that's D-O-S-E?

A Yes.

Q (BY ATTORNEY HAILEY) And CLAUDE responds:

Here are the lyrics to the song "Every Little Thing She Does is Magic" by The Police.

Do you see that?

A I do see that.

Q And then what follows appears to be lyrics to that song?

ATTORNEY GOOCH: Objection, misstates the record and facts not in evidence; calls for speculation.

A I do see the lyrics here.

Q (BY ATTORNEY HAILEY) And do you recognize those lyrics?

A I recognize the first two lyrics in one of

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the choruses, but the rest, I -- again, I don't know if it's exact.

Q But you recognize some of these lyrics from the song "Every Little Thing She Does is Magic"?

A Yeah, I recognize in particular the lyric "Every Little Thing She Does is Magic."

Q Okay. You can set that exhibit aside.

Mr. Ganguli, had you previously seen any of those CLAUDE records that we were discussing as part of your Clio analysis or otherwise?

A Well, there's -- there's two answers to that question. I have never seen this document before.

And again, Clio does not output actual conversations. It would just group conversations that are similar together in a cluster of such conversations.

Q So having reviewed these records, do you now agree that CLAUDE users have used CLAUDE to request lyrics and that CLAUDE has outputted lyrics in response to those requests?

ATTORNEY GOOCH: Objection, states facts not in evidence; and asked and answered.

A These look to be conversations people are

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having with CLAUDE from different models. One is from 2023; one is from 2024 that we have discussed.

I don't know whether these -- the 2023 one was experimental or the 2024 one.

And I do know that people have asked to generate song lyrics, as we have discussed. And CLAUDE appears to generate what can be construed as song lyrics.

Q (BY ATTORNEY HAILEY) Do you agree that third-party CLAUDE users have also used CLAUDE to request song lyrics by specific artists or songwriters?

ATTORNEY GOOCH: Objection, scope.

A According to these prompts that people are using that we just discussed, those were specific artists, specific songs, and CLAUDE-generated song lyrics.

Q (BY ATTORNEY HAILEY) And beyond the exhibit we just discussed, more generally do you understand that third-party CLAUDE users have used CLAUDE to request song lyrics by specific artists or specific songwriters?

ATTORNEY GOOCH: Objection, asked and answered.

A I want to make sure I understand the first

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part of that question.

Can you repeat that part?

Q (BY ATTORNEY HAILEY) I -- my previous question, when I asked, you referred to the exhibit that's in front of you, and I'm -- I'm not referring anymore to this specific Exhibit --

A Okay.

Q -- 3 anymore.

I'm asking: Beyond the exhibit, are you aware that third-party CLAUDE users have used CLAUDE to request song lyrics by specific artists or songwriters?

ATTORNEY GOOCH: Objection, asked and answered.

A Sorry. I'm now aware of it having seen this document, that there are some instances of this happening on models that I'm not sure are experimental. One of them is old.

And I know that in our Clio clusters, we see that -- that I have looked at, there are people sort of using CLAUDE to analyze song lyrics, interpret song lyrics, and generate new song lyrics.

But again, with the Clio clusters, which is where I sort of studied this information, I don't actually have access to the full prompts and

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completions, so I can't know the details of what's happening other than what CLAUDE provides as a summary.

Q (BY ATTORNEY HAILEY) Do you know whether third-party CLAUDE users have used CLAUDE to request translations of specific existing song lyrics?

A I believe that -- I know that people use CLAUDE for translation. And I think that there -- there was something in a Clio cluster -- again, we can -- about sort of -- sort of translating song lyrics.

I don't know whether that's for helping someone understand a song that's in a language that they don't speak. Like, I can't speak to those details.

Q But you have seen instances in which third-party CLAUDE users have used CLAUDE to request translations of existing song lyrics?

A I know that people use CLAUDE for translation written -- like, generally. I know that people -- it's not typical for people to use CLAUDE to discuss anything about song lyrics. I think that that's -- that's rare and not a typical usage of CLAUDE.

And those are the two things I know. And