EXHIBIT 2

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL, * Plaintiffs, * VS. * ANTHROPIC PBC, * Defendant. * CIVIL ACTION * NO.: 5:24-cv-03811-EKL * SVK

****

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

ORAL AND VIDEOTAPED DEPOSITION OF

COLIN STOKES

MARCH 6TH, 2026

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ORAL AND VIDEOTAPED DEPOSITION OF COLIN STOKES, produced as a witness at the instance of the PLAINTIFFS, and duly sworn, was taken in the above-styled and numbered cause on the 6th of March, 2026, from 9:03 a.m. to 3:22 p.m., via Zoom, before Tammy Staggs, CSR in and for the State of Texas, reported by machine shorthand, at the Springhill Suites by Marriott Denton, 1434 Centre Place Dr, Denton, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the

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record or attached hereto. That the deposition shall be read and signed under penalties of perjury. That the deposition shall be read and signed before any notary public.

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A P P E A R A N C E S

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PROCEEDINGS

THE VIDEOGRAPHER: We are now on the record. Today's date is March 6th, 2026. The current time is 9:03 a.m. This is the video deposition of Colin Stokes.

Will counsel please announce themselves for the record.

MR. KING: Yes. My name is Jonathan King. I'm with Cowan, Liebowitz & Latman. I am -- we are one of the firms representing the Plaintiff Music Publishers in this case.

MR. GRUBOW: This is Jared Grubow with Wilmer Cutler Pickering Hale and Dorr on behalf of Anthropic PBC. I'm joined on the Zoom by, I believe, my colleagues Becky Maz and Carl Johnston, in-house at Anthropic.

THE VIDEOGRAPHER: Will the court reporter please swear in the witness.

COLIN STOKES,

having been first duly sworn, testified as follows:

EXAMINATION

BY MR. KING:

Q. Good morning, Mr. Stokes.

A. Good morning.

Q. As we just met a moment ago, my name is John King. I'm going to be taking your deposition today. Have you ever had your deposition taken before?

A. I haven't.

Q. Okay. I'm sure your counsel has given you a heads-up, but let me just lay out some of the ground rules.

I will be asking you questions, and you will be answering them under oath. If you don't understand my question, let me know and I'll try to rephrase it.

I may ask you about some circumstances or facts you may not remember. Even if they relate to the preparation of your expert reports in this matter, I don't want you to guess or speculate. By the same token, I'm entitled to your best recollection of the facts and circumstances I'll ask you about.

From time to time, your counsel Mr. Grubow may assert objections. In the vast majority of cases, those objections are solely for the purposes for preserving certain positions on the record. So should this transcript ever be used at trial, it preserves Mr. Grubow's ability to say: I object to that question for this, that, or the other reason. But notwithstanding those objections, you're required to answer my question.

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The only exception to that is if I invade a privilege, then we can talk about it. And that's the sole circumstance in which he would be permitted to instruct you not to answer. Otherwise, you need to answer my questions.

And perhaps the most important ground rule is human beings talk over each other, but we have a court reporter here. So I'll try to not step on your toes; and, likewise, wait until I finish my question, even if you know where it's going, until you answer.

Is all that understood?

A. Understood.

Q. Okay. So my understanding is that your academic background is in various aspects of music. Right?

A. Correct.

Q. So you have a degree from the Eastman School of Music in Rochester, right?

A. Correct.

Q. And you got a BA in music performance?

A. A BM, Bachelor of Music.

Q. And -- and was this specifically performance as a cellist?

A. It was performance as a cellist.

Q. Okay. You also have a degree from Juilliard

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in New York. What's your degree from Juilliard in?
A. This is a Master of Music in Performance.
Q. Okay. And you're currently a PhD candidate at North Texas State; is that correct?
A. Yes. It's now called the University of North Texas.
Q. Okay. It's the same school, right?
A. Yes, it is.
Q. I knew it as -- by its earlier name.
And your Ph stud- -- PhD studies are in composition, correct?
A. My PhD studies are within the composition division, but I'm specializing in computer music media. And specifically my research is focused on artificial intelligence and computer music systems' design.
Q. A few questions about that. So is -- is your academic work at University of North Texas the first time you've sought a degree in either compu- -- computer music or AI-related music?
MR. GRUBOW: Objection to the form.
MR. KING: You can answer.
A. So I've been engaged in computer music since shortly after graduating from the Juilliard school in 2012. I briefly studied at the Manhattan School of Music in the contemporary performance program, and part

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of that study was focused on performing with electronics. So this involved coding in environments like Max/MSP and other computer music media-type work.
Since then I've had a long touring career with Symphoniacs, which involved extensive performing with electronics. And additionally, my, sort of, hotel room hobby from these years on the road was focused on computer music. So I've been working in this domain actively since 2014.
Q. (BY MR. KING) Yeah, my question was a little different. I understand that.
So the -- the Manhattan School of Music experience you had was a single seminar, correct?
A. No. I discuss a single seminar in this report. It was the first semester of a second master's degree, which I terminated to go on the road with Symphoniacs.
Q. So it was -- so it was -- it was -- it was a single semester but involving multiple classes?
A. Correct.
Q. Of one of which related to computer music, right?
A. One of the courses I mention in here at the -- at Manhattan School of Music related to song writing. I had one class that was performing with electronics. But

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beyond that, my practice at that time and my private lessons as a cellist and my engagement with contemporary music became focused on performing with electronics.
Q. And I understand that.
What my question was, was: Is your PhD program at University of North Texas the first time you've sought a formal degree in either computer music or AI-related music?
MR. GRUBOW: Objection, asked and answered.
A. I'm happy to answer that question again. I began a second master's degree in contemporary performance which involved extensive computation -- computational aspects, and I intended to complete that degree until another opportunity came along.
Q. (BY MR. KING) You're referring to the Manhattan School of Music?
A. I'm referring to the Manhattan School of Music.
Q. Okay.
A. And then I worked privately in this field.
Q. I'm just asking about when you -- when you sought an academic degree. I understand the other qualifications you're making.
So my understanding is in terms of formal

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academic training at an academic institution, there's the Manhattan School of Music semester with the one class associated covering computer-related music and your current studies at University of North Texas, correct?
MR. GRUBOW: Objection, misstates testimony.
A. So in addition to my private research, as a professional musician with more than 20 years in this field, I have done one semester of master's level study at Manhattan School of Music that focused on performing with electronics and contemporary music. And then I've completed or nearly completed four years at the PhD level, including successfully defending my dissertations this week. So I'm --
Q. (BY MR. KING) Congratulations --
A. -- very nearly finished with this degree. Thank you.
Q. When do you expect to get your PhD?
A. I will do the final submission -- final edits this weekend, submission next week, and my degree should be conferred in early May.
Q. In your expert report -- your opening expert report, which we'll take a look at shortly, you describe yourself as, quote, a composer, cellist, and music

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Q. So to date, the -- it sounds like the training datasets for Lyra have been entirely self-created; is that correct?
A. I'm not the only one working on this model, but in my use, the datasets have been self-created.
Q. You don't have training in psychology, correct?
A. I'm not a psychologist, no.
Q. Okay. And your -- you don't have academic training in consumer behavior, right?
A. I'm not a behavioralist either, no.
Q. Okay. You don't have training in linguistics, correct?
A. I'm not a linguist. Though as part of the methodology of music theory, of course, we analyze text; and I've been doing this since my high school music theory courses.
Q. I know, but you don't hold yourself out as an expert in linguistics, right?
A. I would say that I have specific expertise in analyzing how lyrics and music interact.
Q. I was actually just asking about the general field of linguistics. You don't hold yourself out as an ex- -- you don't have an academic degree in linguistics, do you?

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A. As I said, I'm not a linguist. But I have specific domain expertise in how words and music work together.
Q. I mean, you're not a lexicographer, for example, right?
A. I'm also not a lexicographer, but I have specific expertise in how words and music work together.
Q. Like for -- you haven't published papers on semantics, correct?
A. I have a paper that I'm preparing for publication. It was part of a doctoral seminar. I think I reference it in my report, analyzing specifically how text is used in popular music. In this case, I was analyzing stereo field and source separation and how this affects the analysis of -- of text and music.
Q. You don't have any academic expertise in literature or poetry, correct?
MR. GRUBOW: Object to the form.
A. I would argue that as a part of my -- as part of my three degrees, I have spent quite a lot of time analyzing texts and literature as -- as is appropriate as it relates to music.
Q. (BY MR. KING) But you do not have any academic degree, for example, in poetry, right? That is

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an academic discipline. And to the best of my understanding, you do not have any degree in poetry, right?
MR. GRUBOW: Objection to the form.
A. I'm not a poet as a stand-alone artistic practice, but I use text in my work. I write lyrics. I analyze lyrics. And I have a substantial background in this analytical methodology.
Q. (BY MR. KING) You're not a historian, right?
A. I would have a similar answer to you. I've been studying music history for decades now, and I have a very deep, deep expertise in music historical issues.
Q. You're not an expert in the business of music, but I'm -- I'm distinguishing that, let's say, from music theory, your academic theories. But sometimes, for instance, in these cases there will be a person who will testify to the customs and practices and business transactions, music publishing, royalty streams. That is not your area of expertise, right?
MR. GRUBOW: Object to the form.
A. I wouldn't put myself as an expert in any legal matters. I have no legal training, but I have more than 20 years of experience in this field.
As you see from my discography, I've released albums with many labels, including the major

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labels: Universal, Warner, EMI, et cetera, as well as many of the smaller classical music labels. So I have -- I have quite a lot of experience in the business of being a musician.
Q. (BY MR. KING) But, for instance, are you an expert in -- in the royalty streams? For instance, how streaming income is calculated and dispersed among various rightholders?
MR. GRUBOW: Object to the form.
A. I'm not a lawyer. So I haven't developed expertise in specific legal aspects of -- of streaming royalties.
Q. (BY MR. KING) And, obviously, you've done some academic writing and published papers, correct?
A. I have.
Q. And you have advocated in your writings for the position that is essential that AI systems not replace human creativity, correct?
MR. GRUBOW: Object to the form.
A. I believe that AI systems can be used to -- to augment, to expand, and enhance human creativity. And this is -- this is how I use it, and I've shown in many examples through this report how it's used this way.
Q. (BY MR. KING) But you -- but -- but -- but again you've got to listen to my question. You've

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MR. GRUBOW: Object to the form.
A. I'm happy to take your word for that. But the -- the important point I'm making is that it's important to contextualize how lyrics are used in music, which was a main assignment, a main thing I was asked to opine on in this case.
To contextualize how lyrics are -- are used in music, we have to get a baseline understanding of what the components of a musical composition are. And that's exactly why I discuss music without lyrics. It has nothing to do whether all the works-in-suit use lyrics or not. It's to gain a baseline understanding of the -- of the language of music, which I do in this -- let's see -- which I offer in this Section 3 of my first report.
Q. (BY MR. KING) Do you understand it to be a contested -- do you understand the Plaintiffs ever to have alleged in this case that lyrics are the only portions of a musical compensation, that there are no other musical elements?
MR. GRUBOW: Object to the form.
A. I'm happy to return to paragraph 10 where I detail my understanding of the allegations as they pertain to -- to my assignment in this case.
My understanding is that those allegations

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are that Plaintiffs allege Defendant's infringement of copy written -- copyrighted works in the development and use of its genAI products. And they allege that the Defendant -- what was it -- copied and disseminated Plaintiffs' works, including lyrics.
Q. (BY MR. KING) Let me ask you something. You -- don't you think that your average lay listener understands that music has different components? It might have lyrics. It might have melodies or rhythms. People generally understand that, correct?
MR. GRUBOW: Objection to the form.
A. In my work as an adjunct instructor at Dallas College, I teach music appreciation. The -- which is a require -- acquired -- required common core -- I don't know if I have the exact correct terms for Texas education system, but it's a required course at that college.
And one of the things we cover with these students are the basic elements of a music composition. And I can tell from many of my students, they -- they haven't considered these specific components of musical composition before. So I would say the answer to your question is no, not always.
Q. (BY MR. KING) Do you think your average lay listener understands that there are some songs that have

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lyrics and some that don't?
MR. GRUBOW: Objection to the form.
A. I believe an average listener listening to a song would be able to tell if there are lyrics or not.
Q. (BY MR. KING) Right. And an average listener understands that lyrics are words often sung by a singer and that there's other music besides what they're hearing vocalized by music, right?
MR. GRUBOW: Objection.
Q. (BY MR. KING) Modern popular music as an example.
MR. GRUBOW: Objection to the form.
A. Again, I believe, yes, insofar as an average listener can differentiate between a human voice and what's not a human voice. But I don't think an average listener necessarily has a knowledge of -- of how lyrics are set in music and the important emotional and narrative value that lyrics derive from their musical setting.
Q. (BY MR. KING) Let's look at paragraph 17A of your report, Stokes Exhibit Number 3. This falls under a heading which is the summary of the conclusions you reach in this report. Right? Let's look at the second sentence of paragraph 17A.
You say, (as read): Lyrics can be a

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meaningful part of a composition but derive much of their value and expression from their setting within the rest of the musical composition and take on particular meaning when paired with melody, harmony, instrumentation, and other compositional elements.
So the first part of that opinion is that lyrics can be a meaningful part of a composition. What do you mean by "meaningful"?
A. Of course lyrics can be a meaningful part of a composition. If -- if text didn't have meaning, we wouldn't be able to have this conversation. So I'm saying that while lyrics can be a meaningful part, they derive much of their narrative and emotional value from the particular ways they're paired with these musical elements that I lay out. And I -- I -- I believe I give many examples of -- of how this works --
Q. We'll get to that.
A. -- in Section 3. I'm still answering.
For example, the -- the -- the perceived valence of specific types of chords. Minor -- quiet minor chords -- so I'm talking about dynamics and harmony here. Quiet minor chords can be -- are perceived as -- as sad or vulnerable. Whereas loud minor chords can be perceived as -- as angry.
Then the same -- same thing goes for --

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for major chords. They -- they can contain -- they have, sort of, inherent valence based on our Western musical system. Right? So I think it's -- it's important to discuss how these musical aspects provide this -- this meaning.

Take, for example, my -- my example of "Respect." The original song was sung by Otis Redding, and many analyses that I -- or the analyses I -- I cite in my report show that the original song was seen as being somewhat misogynistic. And with -- with just very minor changes to the lyrics, it was sung by Aretha Franklin and became a feminist anthem. That meaning change is not coming from a change in the lyrics.

Q. That -- that --

A. It's coming from other musical aspects that are completely chaining -- changing the meaning of those words.

Q. Right. And -- and the lyrics to "Respect" are tremendously commercially valuable, aren't they?

MR. GRUBOW: Object to the form.

A. I -- I'm not a lawyer. I have no -- no concept of or no expertise in deciding their commercial value. But I'm -- I'm telling you -- I'm telling you that -- that -- or what I'm attesting in this report and what I'm trying to explain right now is that the meaning

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of these lyrics in that case are entirely dependent or greatly dependent on -- on non-lyrical elements.

So I discuss many examples of this -- I'm sure we'll go through others -- that lyrics derive much of their meaning from their musical setting.

Q. (BY MR. KING) Let's look --

MR. GRUBOW: I'll instruct the witness to slow down for the court reporter a little bit.

Q. (BY MR. KING) Look at paragraph 19 of your report, Stokes Exhibit Number 3. You say that, (as read): My conclusion that lyrics derive much of their value from the other elements of the composition is grounded in the principles and methods of music theory.

What is your measure of value?

A. I'm using value here to discuss their emotional and narrative communication. I'm -- I'm using this to discuss their role in an overall musical composition.

Q. Okay. And how do you measure their narrative or expressive value? What metric are you using?

A. Sure. I'm using the common methodologies of -- of music theory. Just how we analyze anything in music. So we -- we have traditions and expectations in -- in Western music; and how composers use these traditions or push against them, how they use harmony

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how they use melody, all of these -- all of these established trends we can use as -- as a baseline. And we -- we analyze how composers operate within that structure. So I'm using the methodology of -- of -- of music theory and in some clas- -- some cases music history and musicology to analyze these works and come to these conclusions.

Q. So when you refer to the value of lyrics or the value of any particular musical element, you're not talking about commercial or economic value, right?

MR. GRUBOW: Object to the form.

A. Correct. I'm talking about their value as a -- as a component of that song in the final emotional and narrative impact of that song.

Q. (BY MR. KING) This is what I'm trying to specify. So -- so when you use value -- probably meaning, but let's stick with value -- you're talking about their value in their ability to, what, communicate a certain emotion?

A. Yes. I'm talking about -- I mean, as I -- as I state in my summary of conclusions, I'm talking about how lyrics exist within the framework of an entire musical composition.

Q. No, I understand -- I understand your position about the integrated sections of musical composition and

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their respective influences on each other. Right? Lyrics can influence harmony and melody, right? And harmony and melody can influence lyrics, right?

MR. GRUBOW: Object to the form.

A. I belive there were two -- two points there. I'm arguing how lyrics are impacted by -- or I'm analyzing how lyrics are impacted by their -- their musical setting. I'm not making any economic judgment to the value of any specific component of a composition.

Q. (BY MR. KING) And you're not applying any quantitative measure, right? You're not -- these values that you're assigning to lyrics with or without music, you're not assigning in your report and you don't make any effort to assign any quantity of value to those measures, right?

MR. GRUBOW: Object to the form.

A. I'm applying the -- the methodologies used in music theoretic research and at sometimes musicological and music historical research.

Q. (BY MR. KING) But is -- but is your analysis in this expert opinion that you're offering in this case at all a quantitative measure of the value of lyrics?

A. Again, I'll -- I'll state I'm using the common methodologies of -- of music theory. I am analyzing -- I analyze throughout this report specific -- I analyze

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is?
A. I recognize the name.
Q. Yeah, he's tight in the country music world.
So -- so, again, I'll represent to you in that world, three chords and the truth is sort of a clich for the notion that country music is really about the story told by the lyrics accompanied by, you know, maybe three chords.
Is that -- is that a -- putting aside whether you're familiar with that particular clich, do you recognize that for country music lyrics are often the most important element of the composition?
MR. GRUBOW: Object to the form. Also assumes facts not in evidence.
A. I -- I think that that statement is a simplification of -- of how country music works. First, I think it assumes that a simple chord progression has less meaning than a complex chord progression, which I don't -- I think musical repetition is one of the ways that composers and songwriters create meaning in their works. So I -- I wouldn't agree with that contention that -- that lyrics are relatively more important in a specific genre of music.
Q. (BY MR. KING) In paragraph -- actually multiple times throughout this report and also your

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reply report, you reference Ariana Grande's "7 Rings," right?
A. I do.
Q. And I believe what you're observing in those instances is that while she's borrowing the melody but not the lyrics from "My Favorite Things," listeners can hear and recognize that musical composition as interpolated in her piece "7 Rings," right?
A. Yes, I believe that a listener that has heard the original song from Sound of Music would recognize those borrowed musical elements in "7 Rings."
Q. She does say my favorite things, doesn't she, Ariana Grande? So she does -- not withstanding this fact that you say she doesn't go into any of the lyrics. Just as a point of clarification, she does quote that lyric, my favorite things, right?
A. It's been some time since I've done this analysis. So I think if I were to speak to specific lyrics in that -- in that composition, I would need to have them in front of me.
Q. If someone were familiar with "My Favorite Things" and they heard raindrops and roses, whiskers on kittens, they would also probably recognize from which composition it came, right?
MR. GRUBOW: Object to the form.

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A. I -- I think I would be guessing to -- to, sort of, answer a hypothetical question here. But I believe that, of course, as I said earlier, texts can have meaning too. It's how we communicate. So -- so, yes, of course, I think words can have meaning and can be memorable.
Q. (BY MR. KING) Well, weren't you guessing when you said that listeners could recognize the melody of "My Favorite Things" without hearing the lyrics? I mean, you were willing to guess in that instance but not to guess the converse, which is that people can recognize the song also by its lyrics?
MR. GRUBOW: Objection to the form.
A. I don't believe I was guessing in the first instance. In fact, I can recognize the melody from -- in "7 Rings." So I'm -- I'm basing this on -- on the fact that I find it to be recognizable, as do other people that I cite in this report.
Q. (BY MR. KING) In other words, your -- your -- your opinion with respect to Ariana Grande that people can recognize "My Favorite Things" is just based on your own personal ability to recognize the song? Not any scientific study you did about listener's ability to recognize "My Favorite Things" behind "7 Rings"?
A. I can --

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MR. GRUBOW: Object to the form.
A. I can turn to the section where I discuss this, but I am not relying on my personal opinions. I'm relying on the documents I cite and the standard methodology of music theoretic research, as I do in all of my research work.
Q. (BY MR. KING) Okay. So then explain it to me. What is your scientific basis for saying that listeners -- let me ask the question a different way because -- because I really want to understand what you're saying.
You didn't do any kind of survey or study of listeners to determine how many of them could recognize the name "My Favorite Things" in "7 Rings," right?
MR. GRUBOW: Objection to the form.
A. I'm not a scientist, and it's not part of my -- part of my assignment here to conduct any scientific studies. My assignment here is to analyze how lyrics function within a larger musical composition. And I am applying the common methodologies of my field in this analysis.
Q. (BY MR. KING) So then what is your methodological basis, even if not scientific, for saying that listeners can recognize "My Favorite Things" in

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Ariana Grande's "7 Rings" or any of the other examples you give where you say listeners can recognize a song even without its lyrics?

MR. GRUBOW: Objection to the form.

Q. (BY MR. KING) What's your methodology for making that determination?

MR. GRUBOW: Objection to the form, asked and answered.

A. As I stated, I'm using the common methodologies of music theory, musicology, and music historical research in my analysis of these works.

Q. (BY MR. KING) So let's look at paragraph 28 of your report, which is Stokes Exhibit Number 3. We can look specifically where you make this statement. Near the bottom of that paragraph 28 on page 13 of your report, you say, (as read): Similarly, the listener is still able to identify the underlying reference to the well-known song "My Favorite Things" from The Sound of Music in Ariana Grande's "7 Rings," a work-in-suit, even though Grande only uses the melody but none of the lyrics.

And I just want to know what's your methodology for saying what -- what's your basis for saying what listeners -- not what you but what listeners -- general listeners, whether they can or

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cannot recognize the song from The Sound of Music in Ariana Grande's performance?

MR. GRUBOW: Objection to the form.

A. Sure. I'm -- I'm happy to answer this again. I'm using the common methodologies of music theory in which we look at the elements of music and how they're -- how they're interacting to -- to analyze music. So I use those same music theoretic methodologies that I use in -- in all of my research with this type to analyze this song.

Q. (BY MR. KING) I understand that's how you analyze a song, but you're drawing a conclusion about what listeners can and cannot recognize. So your standard methodologies and application of music theory permits you to make a conjectural determination about whether listeners can or cannot recognize a song without its lyrics?

That is something you could otherwise study by testing, but you haven't tested it. So what I want -- you're saying you're using standard methodologies. Tell me what that methodology is. How do you know that consumers can recognize that? Is it just a matter of common sense? I mean, I'll accept that too.

MR. GRUBOW: Objection to the form.

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A. I believe it is common sense that certain songs are recognizable. For example, if I hummed the "Happy Birthday" theme to you, I think it would be fair to assume that you would recognize that song. Beyond that, in this case, I'm looking at the music theoretical similarity between these -- these melodies and otherwise using these music theoretic methodologies to -- to come to these conclusions.

Q. (BY MR. KING) Yeah, those -- those methodologies permit you to see how much of "My Favorite Things" appears in Ariana Grande's "7 Rings." Those methodologies don't inform you about listeners' ability to recognize the underlying song that's been interpolated, do they?

MR. GRUBOW: Objection to the form.

A. I believe they do. I believe that music theory is based on the -- methodologies of music theoretic research are based on centuries of -- of the analysis of Western music. Of course, there's music theories of other types of music. And within this research, we've assigned over common practice specific meanings to -- to certain musical tropes or musical patterns, melodies, phrases, forms, larger structures in music.

And through looking at -- through looking

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at these -- these two works, I think that there's -- there's plenty of -- there's plenty of -- there's plenty of avenues for -- for looking at the recognizability, for example, of this melody between the two uses.

Q. (BY MR. KING) But at least in this paragraph 28, you don't explain what methodology you use. You just say listeners are still able to identify the underlying reference, right? You don't cite to any particular musical principle that -- that proves that point, right?

MR. GRUBOW: Objection to the form.

A. If you like, we could look at the citation together. I would be happy to -- to look through that with you together.

Q. (BY MR. KING) Are you talking about an article in Variety by a non-musicologist, right?

A. So I use a lot of peer-reviewed and academic research. I used a lot of peer-reviewed and academic research in preparation of this report. But, of course, when -- when looking at contemporary practices in pop music, often that research hasn't been done yet. We're talking about -- about recent things.

Additionally, many pop artists discuss their work with sources like Variety and Billboard rather than with musicologists and music theorists, so

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(Exhibit 5 marked.)
Q. (BY MR. KING) Okay. Just for identification purposes, I'm showing you an article that was published in December of 2025, a few months ago, in the same journal Psychology of Music from which -- in which the article you cited was published. It's called Systematic Review and Meta-Analysis on the Psychological Affect of Song Lyrics: A Perspective from Critical Musical Education.
A. Sure.
Q. And, again, we'll never go home if I ask you to read this. I'm just going to ask you about a few points. Let's look at the abstract, which is basically a summary of conclusions. You'll see that on the second page. Starting with the second sentence it says, (as read): Particularly -- particularly the influence of lyrics has been explored in various psychological studies due to their capacity to convey narratives and imagery that shape perceptions of reality and interpersonal relations.
And then jump several sentences down, it says, (as read): The results reveal medium affects on cognitive behavioral and attitudinal levels.
I want to ask you about that since that is truly in the practice of psychiatry. And says, (as

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read): High affects on emotional levels, all consistent with the conveyed message.
So you can -- you can read the article and draw distinctions at the appropriate time. What I want to know is: were you aware that, for instance, there was a recent publication of an article that did a scientific study showing that lyrics have a high affect on emotional levels?
MR. GRUBOW: Object --
Q. (BY MR. KING) Were you aware of this article?
MR. GRUBOW: Objection to the form.
A. I reviewed a great deal -- a great number of articles for this -- for -- for these reports, and none of them have altered my -- the conclusions I came to, otherwise, I wouldn't have come to those conclusions.
I -- I would be happy to -- to look through this report -- this article you're -- you're presenting to me. But I can say from the -- the article -- from the abstract I -- I don't see that there they're comparing -- or contextualizing lyrics within a musical context, which is what I'm doing in my report.
Q. (BY MR. KING) What you would learn from this is this is actually a survey of 82 other studies that have been conducted. So many, many over the last 20 years. And one of its principle conclusions is that

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lyrics have a high affect on the emotional response of listeners as elicited in 82 other studies. Does that surprise you, that result?
MR. GRUBOW: Objection to the form.
A. I also find in my report that lyrics are part of a musical composition. And though I state that they derive much of their meaning from their seating within the other musical elements, I -- as I said earlier, of course lyrics play a role in the overall communication of meaning and music.
Q. (BY MR. KING) Let me ask you this. I -- I'm not an academic. I'm not a music researcher. But in prepping for this deposition what I did is I did a few Google searches about the value of lyrics, and I came up with the Ali article, and then these two that I've shown you, and many, many others. We can go through some of them. I suspect we'll just be going around in circles.
Did you do the same thing? Did you do your own original research just looking for articles, including in the journals that you cited, sort of assessing the emotional affect of lyrics, either independently or vis-a-vis other musical elements?
MR. GRUBOW: Objection.
Q. (BY MR. KING) Because you cited only the Ali article. And I guess what I'm wondering is why I, as a

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lawyer, was able to pull these up in half an hour and you elected not to cite any of these other articles?
MR. GRUBOW: Objection to the form.
A. I -- I followed my standard and rigorous methodologies of music theory, musicology, and music history in the preparation of this report. And as I follow them in all of my research, I reviewed many resources, as you can see in the Appendix B I believe of this report and Appendix A of my reply report. And to the extent that I -- to the extent that I saw anything, if I saw anything, that -- that does not agree with my report, it didn't change my opinions. The -- the evidence I reviewed and came across support my opinion, as I document in my citations.
Q. (BY MR. KING) So if you found references with contrary conclusions, you elected not to disclose them in your report because you didn't agree with them, right?
MR. GRUBOW: Objection to the form.
A. I believe that's a mischaracterization of -- of my previous answer and also of -- of my research in this report. I do have -- I do have sources cited in this report that aren't all positive, that have nuanced views. I could find these for you. It would take me a moment. But the sum total of the research I did

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supports the conclusions as I came to them.
Q. (BY MR. KING) Well, I did look through all your citations, and the only scientific study I saw were where scientists/researchers actually tried to gauge in the scientific setting the emotional affects of lyrics was the Ali article. So I'm wondering why you selected only that one and not this other literature on a subject that seems to be widely researched.
MR. GRUBOW: Objection to the form.
A. Sure. So in -- in this report, I'm -- as -- as an -- as an expert in composition/songwriting with a background in the methodologies of music theory, music history, and musicology, I'm -- I'm not -- I'm not a psychologist and I'm not purporting to -- to create a psychological study with this report. What I am doing is analyzing lyrics in the context of music from a music theoretic position and the other methodologies as I've attested to before.
Q. (BY MR. KING) Right. And -- and -- and part of your analysis is to make judgments about how listeners emotionally react to different elements of music, right?
MR. GRUBOW: Object to the form.
A. Could you restate that for me?
Q. (BY MR. KING) Sure. Let's just read it back.

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And part of your analysis is to make judgments about how listeners emotionally react to different elements of music, right?
MR. GRUBOW: Object to the form.
A. Part of my analysis is analyzing how lyrics function within their larger musical context from a music theoretic perspective.
Q. (BY MR. KING) Okay. So let's specify that because I agree that that is your analysis. But frequently, with respect to all these examples, you'll often make the point -- whether it's with Ariana Grande or the example of "Respect" by Otis Redding and Aretha Franklin or any of the other examples you give -- you will make a judgment about what you call, I guess, the emotional or expressive value of lyrics as mediated by these other elements, right?
MR. GRUBOW: Object to the form.
A. So as part of a music theoretic analysis, we're relying on well-established tendencies in -- in Western music to ascribe certain types of meanings to certain types of musical events. So we discussed this earlier, but, for example, there's well-documented or -- well-established meaning ascribed to certain types of major chords, certain types of minor chords, or augmented diminished chords. And this -- this

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methodology of music theory derives or ascribes meaning to certain types of certain combinations of musical events, including lyrics, and that's the methodology I used. So --
Q. (BY MR. KING) So --
A. -- I'm -- I'm not -- I'm not purporting to -- to undertake a psychological study here. Rather I'm using well-established techniques for analyzing how composers and songwriters use music for narrative and emotional communication.
Q. So I understand -- and I understand your point, a minor chord might suggest sadness or when dynamically amplified, anger versus C major 7 played quietly. That's from the perspective of a composer.
The question is -- I'm trying to understand -- is your opinion here purporting to tell us how listeners, how consumers of music respond to these musical elements? When you say a song conveys a fragile state, are you saying that your expertise permits you to say: Yes, listeners interpret this moment in this song as conveying a fragile or defeated emotional state?
MR. GRUBOW: Objection to the form.
A. I would say absolutely, yes, my expertise in music theory allows me to analyze music and look at how composers and songwriters use certain combinations of

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musical events to communicate narrative and emotional meaning.
Q. (BY MR. KING) In your report, Stokes Exhibit Number 3, starting at subsection 3, paragraph 35, you talk about the variety of ways composers and songwriters coordinate lyrics with other musical elements, right? Compositional practices, right?
A. I believe you're referring to -- beginning in paragraph 34; is that correct?
Q. Yes.
A. Okay.
Q. And -- and you describe instances where music is written first. Lyrics are written first. Top lining and various others techniques. The variety of ways in which lyrics may end up in a song, right?
MR. GRUBOW: Object to the form.
A. In section -- this is, what section, III B; is that correct?
Q. (BY MR. KING) I believe so, yes.
A. In Section III B, I'm discussing the variety of compositional practices of composers and songwriters and demonstrating how lyrics are one part of -- if they -- they are at all, one part of musical composition.
Q. Right. Now, listeners/consumers generally won't know anything about those compositional practices,

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creation of new works.
Q. (BY MR. KING) Right. You -- you -- you quoted from the Complaint. But what I'm wondering is: Are you, as an expert witness in this case, trying to say by offering these examples that the Plaintiffs in this case are just like those naysayers in the past? They're not embracing technology, and they will be proven wrong. Is -- is -- is that by implication what you're saying?
MR. GRUBOW: Objection to the form.
A. I believe I'm -- I'm contextualizing genAI as a technology within a long history of -- of technological disruptions. And I quote from the report that Plaintiffs voice growing alarm over the spread and increased use of this technology and that the Plaintiffs claim the technology will have potentially devastating effects on artists and the creation of new works. I do believe that -- that the examples I provide of -- of other -- other people like John Philip Sousa or later Queen are useful for contextualizing the release -- or the -- to understand the -- the context of the release of genAI and its use in music.
Q. (BY MR. KING) So let's talk about some of these technologies. We mention the aeolian harp. You talk about various different iterations of synthesizers.

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None of those technologies were created by first making copies of human-authored works on mass, were they?
MR. GRUBOW: Objection to the form.
A. I'm not sure I exactly understand the question, but I -- I do believe that -- would you mind restating the question? I'm not sure I have it clear.
Q. (BY MR. KING) Yeah, so let -- let -- let's -- we can put aside the aeolian harp --
A. Sure.
Q. -- since I think it's relatively small market share these days, as cool as it sounds.
But synthesizers -- you go through sort of a historical review of synthesizers; but, of course, they're widely used today. Those technologies -- synthesizer technology was not created by first harvesting copyrighted works, making copies of them and then developing the technology based upon those copyrighted works, correct?
MR. GRUBOW: Objection to the form.
A. I can't make any -- it's outside my expertise to -- to make opinions on -- I think the words you used were harvesting. I also --
Q. (BY MR. KING) Not a legal term.
A. -- don't -- I don't have the expertise to discuss copyright law. But I believe each one of these

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technologies were -- were necessarily different. I'm not suggesting -- that's part of their disruptive nature. I'm not suggesting that the player piano and the synthesizer, for example, are founded on the same technology.
Q. Yeah, I understand that. I'm just trying to see if you agree with this distinction. Forget copyrighted works. None of the technologies that you mentioned -- we can put sampling aside for a moment. That's a little bit different. So exclude that.
But the technologies you mention in part 4 of your report, none of them were first created by copying human-authored works, right? Forget copy, but by making, you know, millions of copies of human-authored works. That was not how those technologies were developed, right?
MR. GRUBOW: Objection to the form.
A. I believe each one of these technologies were created using -- with novel means, and each one of these technologies was -- was developed individually. Each one has different technological underpinning.
Q. (BY MR. KING) Well, can you give me an example of one, other than genAI, that makes copies of, you know, hundreds, thousands, millions, billions of human-authored works to develop the technology?

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MR. GRUBOW: Objection to the form.
A. So if we're leaving apart the aeolian harp, I can -- I can describe the technology in these -- in these different innovations. The player piano uses paper rolls with hole punches in them that can reproduce musical compositions as sort of an early form of recording.
The early synthesizers, likewise, functioned with punch cards in which composers/performers could create sequences of notes that this synthesizer would perform. This was famously popularized by Wendy Carlos in her Switched-On Bach album.
Additionally, the -- the late synthesizers, the Fairlight CMI, first introduced the ability to play back audio clips, and that gets us into the samplers that you asked me to disregard.
Later we have MIDI, which functions as a standardized communication protocol between synthesizers, sequencers, and other connected devices. We still use it. MIDI allows further creation, for example, of a MIDI file that could then play back works on MIDI-enabled devices.
And by the way, MIDI is also very important to the works-in-suit. Any -- any piece of --

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I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of the action.

Certified to by me this _____ day of _____, 20____.



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COUNTY OF _____)
STATE OF TEXAS)

I hereby certify that the witness was notified on _____ that the witness has 30 days or (____ days per agreement of counsel) after being notified by the officer that the transcript is available for review by the witness and if there are changes in the form or substance to be made, then the witness shall sign a statement reciting such changes and the reasons given by the witness for making them;

That the witness' signature was/was not returned as of _____, 20____.

Subscribed and sworn to on this, the _____ day of _____, 20____.



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ERRATA TO THE DEPOSITION TRANSCRIPT OF
COLIN STOKES
TAKEN ON **March 6, 2026**

I have reviewed the transcript of my testimony of **March 6, 2026**, and hereby make the following changes in form and/or substance:

PAGE	LINE(S)	CHANGE	REASON FOR CHANGE
13	9	"Petras Vysniauskas" to "Petros Klampanis"	Transcription error
18	16	"my salary—role" to "my salaried role"	Transcription error
57	16	"to" to "two"	Transcription error
104	15	"psychologists commenting" to "psychologists—commenting"	Correcting punctuation
106	16	"constriction" to "contradiction"	Transcription error
106	17	"always" to "also"	Transcription error
123	1	"journal" to "report"	Clarifying record
127	2	"instrumentation texture" to "instrumentation – texture"	Correcting punctuation
129	23	"resinated" to "resonated"	Transcription error
136	9	"resinate" to "resonate"	Transcription error
138	16	"Chapter" to "paragraph"	Clarifying record
139	19	"out" to "without"	Transcription error
140	20	"DOS" to "DAWs"	Transcription error
140	20-21	"decoding language maximum speed" to "the coding language MaxMSP"	Transcription error
142	4	"mark" to "marked"	Transcription error
157	3	"banned" to "panned"	Transcription error
157	4	"psychologies" to "technologies"	Transcription error
157	13	"Seminole" to "seminal"	Transcription error
165	8	"corporation" to "chord progressions"	Transcription error

ERRATA TO THE DEPOSITION TRANSCRIPT OF
COLIN STOKES
TAKEN ON **March 6, 2026**

I have reviewed the transcript of my testimony of **March 6, 2026**, and hereby make the following changes in form and/or substance:

PAGE	LINE(S)	CHANGE	REASON FOR CHANGE
206	8	"with" to "as"	Transcription error
206	10	"transformable" to "transferrable"	Transcription error
209	5	"though-starter" to "thought-starter"	Transcription error
212	12	"though-starter" to "thought-starter"	Transcription error
215	3	"though-starter" to "thought-starter"	Transcription error
216	3	"though-starter" to "thought-starter"	Transcription error
216	12	"though-starter" to "thought-starter"	Transcription error
218	16	"Caplin" to "Kaplan"	Transcription error
221	22	"rely" to "reply"	Transcription error
222	25	"simply" to "simple"	Transcription error

I, **COLIN STOKES,** read the foregoing deposition and hereby state that the foregoing is true and correct, except as noted herein.



3/31/2026

Colin Stokes Date