EXHIBIT 6

1

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

- - - - - - - - - - - - - - - - x
CONCORD MUSIC GROUP, INC., et al.,
Plaintiffs,
v.
ANTHROPIC PBC,
Defendant.
- - - - - - - - - - - - - - - - x

Case No.
5:24-cv-03811-EKL-SVK

Highly Confidential
Attorneys' Eyes Only
Pursuant to the Protective Order

Videotaped Deposition of BEN ZHAO, Ph.D.
Chicago, Illinois
Friday, February 20, 2026
9:06 a.m. CST

Job No.: 621063
Pages: 1 - 462
Stenographically Reported By:
Michelle M. Yohler, CSR, RMR, CRR

2

Deposition of BEN ZHAO, Ph.D., held at the location of:

ARNOLD & PORTER
70 West Madison Street, Suite 4200
Chicago, Illinois

Pursuant to notice before Michelle M. Yohler, a Certified Shorthand Reporter, Registered Professional Reporter, Registered Merit Reporter, Certified Realtime Reporter, and a Notary Public, CSR No. 84-4531, in and for the State of Illinois.

3

APPEARANCES

ON BEHALF OF THE PLAINTIFFS:
MR. KEITH HOWELL
MR. TIMOTHY CHUNG (Remotely)
OPPENHEIM & ZEBRAK, LLP
4530 Wisconsin Avenue, NW, Fifth Floor
Washington, D.C. 20016
202.480.2999
khowell@oandzlaw.com

ON BEHALF OF THE DEFENDANT:
MS. SONAL N. MEHTA
WILMER HALE
2600 El Camino Real, Suite 400
Palo Alto, California 94306
650.858.6000
sonal.mehta@wilmerhale.com
-and-
MR. JARED V. GRUBOW (Remotely)
WILMER HALE
250 Greenwich Street
New York, New York 10007
212.230.8800
jared.grubow@wilmerhale.com
(Continued)

4

APPEARANCES CONTINUED

ALSO PRESENT:
Mr. Ian Chen,
In-House Counsel for Anthropic
Mr. James Porter, Videographer

5

E X A M I N A T I O N S

WITNESS	PAGE
BEN ZHAO, PH.D.	
By Ms. Mehta	7
By Mr. Howell	425
By Ms. Mehta	428

E X H I B I T S

EXHIBITS		PAGE
No. 1	Expert Report of Dr. Ben Zhao Dated December 19, 2025	172
No. 2	Rebuttal Expert Report of Dr. Ben Zhao Dated January 23, 2026	172
No. 3	"somesite I used to Crawl: Awareness, Agency and Efficacy in Protecting Content Creators From AI Crawlers."	258
No. 4	Reply Expert Report of Dr. Ben Zhao Dated February 13, 2026	318

6

P R O C E E D I N G S

THE VIDEOGRAPHER: Here begins Media Unit 1 in the video deposition of Ben Zhao in the matter of Concord Music Group Inc., et al., versus Anthropic PBC in the United States District Court, Northern District of California, San Jose Division, Case Number 5:24-cv-03811-EKL-SVK.

Today's date is February 20th, 2026, and the time on the video monitor is 9:06 a.m.

The videographer today is James Porter representing Planet Depos.

This video deposition is taking place at Arnold & Porter in Chicago, Illinois.

Would counsel please voice-identify themselves and state whom they represent.

MS. MEHTA: Good morning. Sonal Mehta from WilmerHale on behalf of Anthropic.

MR. HOWELL: Good morning. Keith Howell from Oppenheim & Zebrak on behalf of the plaintiffs.

THE VIDEOGRAPHER: And do we have counsel on Zoom?

MR. GRUBOW: Jared Grubow from WilmerHale on behalf of Anthropic.

MR. CHUNG: Good morning. Timothy Chung on behalf of Publishers.

MS. MEHTA: And then I believe we have in-house counsel from Anthropic also on the line.

THE VIDEOGRAPHER: The court reporter today is Michelle Yohler representing Planet Depos.

Please swear in the witness.

(WHEREUPON, the witness was duly sworn.)

BEN ZHAO, Ph.D.,

called as a witness herein, having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MS. MEHTA:

Q Good morning.

A Good morning.

Q Dr. Zhao, could you please state your first -- or full name and your address for the record, please.

A Sure. Ben Zhao, my -- I'm sorry. You said my address?

Q Yes.

A 130 North Garland Court, Chicago, Illinois, 60602.

Q What do you understand this case to be about?

8

MR. HOWELL: Objection. Form.

BY THE WITNESS:

A I understand this case is about Anthropic's training of data and Anthropic's design of its large language model and its mechanism to operate that model.

BY MS. MEHTA:

Q What legal claims do you understand to actually be at issue in the case?

MR. HOWELL: Objection. Form. Calls for a legal conclusion.

BY THE WITNESS:

A I am not here to speak to the legality of the claims; I'm here as a technical expert, so, as such, I speak to the technical components of the case.

BY MS. MEHTA:

Q Understood. But you understand that in courts of law, the people actually make claims based on legal challenges and then defend on legal challenges --

A Yes.

Q -- right?

A Yes.

MR. HOWELL: Objection. Form.

397

essay that answers a specific question to the specifications that a single professor has given down for a particular class.

Now, today, that is trivially possible. That is no cost. A student can basically go literally for free to Anthropic Claude, and within presumably ten minutes, and quite possibly far less than that, they can produce and generate an essay detailed down to the exact specification of a particular homework assignment, take-home essay assignment, or whatever a particular professor has specified. And that act of plagiarism has been made so much easier by order, multiple orders of magnitude, given the presence and the free access to Claude and similar tools.

Now, if -- in the past we have of course dealt with plagiarism; however, all the mechanisms that we have to detect, defend, and prevent and mitigate issues of plagiarism, we have many.

They are mostly functional in the context of logistics where a student needs to expend significant resources to find a plagiarist -- a plagiarized essay. Whereas, now, it is trivially cheap and easy for them to do so, and they know that detection is potentially costly for us.

398

And, again, I come back to this question of this is about friction, this is about cost, this is about how easy it is and, therefore, how prevalent it is for certain bad actors or for people with bad intentions to carry out acts that produce harm.

MS. MEHTA: Move to strike. Not responsive.

BY MS. MEHTA:

Q When it comes to the benefits of AI, would you agree that the prevalence or scale of the benefits is also relevant?

You just went on a long soliloquy about how important the scale and the prevalence is when it comes to assessing the risks. It's also --

A No, I disagree.

Q -- it's also -- so you don't agree that we should also look at the prevalence or scale when it comes to the benefits?

MR. HOWELL: Objection --

BY MS. MEHTA:

Q Is that -- is that your testimony?

MR. HOWELL: Sorry --

BY THE WITNESS:

A Are you done with your question --

399

MR. HOWELL: Let's --

(Unreportable cross-talk.)

MS. MEHTA: Let me start the question again.

MR. HOWELL: Go ahead.

BY MS. MEHTA:

Q When it comes to the benefits of AI, it's also important to look at the prevalence and the scale of those benefits in evaluating the cost/benefit analysis; isn't that right?

MR. HOWELL: Objection. Form. Vague.

BY THE WITNESS:

A I believe that looking at benefits of AI requires, just as it does to look at harms, to look at concrete examples, quantifiable data, and real research that studies the benefits and harms of AI.

BY MS. MEHTA:

Q And --

A I'm not -- sorry. I'm not done --

Q Go ahead.

A I'm not saying that AI is all bad and has no benefits; there are benefits to AI. There are benefits to multiple types of AI.

And even for a more constrained definition

400

of generative AI, I do believe that there are scenarios where they have some benefit. However, understanding of those benefits should be done with analysis, research, and actual quantifiable data rather than single anecdotes of: I saw one instance of this benefit and, therefore, it must generalize to all.

When I speak to -- about harms, I'm referencing harms that are known, that are not denied, that are observed by many, that are reported in public press, that are reported in academic journals, that are reported in peer-reviewed research publications from many different sites. And there's little dispute that these reports are real, that these harms are together today present today, not hypothetical, not speculative.

BY MS. MEHTA:

Q Have you cited in your reports any public press, academic journal, or peer-reviewed research publication about the benefit of AI?

MR. HOWELL: Objection. Form.

BY THE WITNESS:

A I will be frank: I have kept an eye out for such articles. I have looked for concrete

461

CERTIFICATE OF REPORTER

I, MICHELLE M. YOHLER, a Certified Shorthand Reporter within and for the County of Will, State of Illinois, do hereby certify:

That previous to the commencement of the examination of the witness, the witness was duly sworn to testify the whole truth concerning the matters herein;

That the foregoing deposition transcript was reported stenographically by me, was thereafter reduced to typewriting under my personal direction and constitutes a true record of the testimony given and the proceedings had;

That the said deposition was taken before me at the time and place specified;

That I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the outcome of this action.

462

IN WITNESS WHEREOF, I do hereunto set my hand and affix my seal of office at Chicago, Illinois, this 24th day of February, 2026.

Michelle M. Yohler

Michelle M. Yohler, CSR, RMR, CRR
Certified Shorthand Reporter
CSR No.: 84-4531

No. 621063

Re: Deposition of **Ben Zhao, Ph.D.**
Date: 2/20/2026
Case: Concord Music Group -v- Anthropic
Return to: transcripts@planetdepos.com

Errata

Page: Line	From	To
10:4-6	It's a long claim with a lot of complaints that I read three years ago.	It's a long **complaint** with a lot of **claims** that I read three years ago
26:19-21	I'm not going to get into my personal opinion about what are these issues called.	I'm not going to get into my personal opinion about what **all** these issues **are**.
36:18-19	I meant that if I have a form – fully formed definition	I meant that if I **had a fully** formed definition
81:79-81	we make sure that there is no offensive or legal content	we make sure that there is no offensive or **illegal** content
132:24	what current models do, and current models behave	what current models do, and **how** current models behave
177:15-17	The definition of a data retrieval system is incredibly expensive	The definition of a data retrieval system is incredibly **expansive**
188:23-25	There's cureration, there is weighting, there is all sorts of things that may or may not happen	There's **curation**, there is weighting, there is all sorts of things that may or may not happen
190:20	cureration	**curation**
191:1	tokenize table	**tokenizer** table
194:18	cureration	**curation**
222:25-223:3	I'm sorry. I assume including that is with the research documents but it also includes things like public press and, you know, newspaper and whatnot.	I'm sorry. I assume **included in** that **is the** research documents but it also includes things like public press and, you know, newspaper and whatnot.
289:1:	cureration	**curation**
293:17	cureration	**curation**
293:23	cureration	**curation**
294:3	cureration	**curation**
295:7	cureration	**curation**
295:10	cureration	**curation**
297:12	cureration	**curation**
297:15	cureration	**curation**

No. 621063

Re: Deposition of **Ben Zhao, Ph.D.**
Date: 2/20/2026
Case: Concord Music Group -v- Anthropic
Return to: transcripts@planetdepos.com

Errata Cont'd

Page: Line	From	To
328:6	cureration	**curation**
449:19	cureration	**curation**
452:7	cureration	**curation**

4/1/26
(Date)

(Signature)

No. 621063

Re: Deposition of **Ben Zhao, Ph.D.**
Date: 2/20/2026
Case: Concord Music Group -v- Anthropic
Return to: transcripts@planetdepos.com

ACKNOWLEDGMENT OF DEPONENT

I, Ben Zhao, Ph.D., do hereby acknowledge that I have read and examined the foregoing testimony, and the same is a true, correct and complete transcription of the testimony given by me and any corrections appear on the attached Errata sheet signed by me.

4/1/26 _____
(Date) (Signature)