EXHIBIT 4

(FILED UNDER SEAL)

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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.
v. : 5:24-CV-03811-EKL-SVK
ANTHROPIC PBC, :
Defendant. :
- - - - - - - - - - - - - x

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY -
SUBJECT TO PROTECTIVE ORDER
REMOTELY CONDUCTED VIDEOTAPED DEPOSITION OF
KENT DRAUGHON AS CORPORATE DESIGNEE ON BEHALF OF
CAPITOL CHRISTIAN MUSIC GROUP
WEDNESDAY, NOVEMBER 5, 2025
9:02 A.M. CST

JOB NO.: 606143
PAGES: 1 - 269
REPORTED BY: KARISA EKENSEAIR, CCR RPR RMR RDR
CA CSR #14546

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DEPOSITION OF KENT DRAUGHON, AS CORPORATE DESIGNEE, CONDUCTED VIA ZOOM VIDEOCONFERENCE.

Pursuant to notice, before Karisa J. Ekenseair, Certified Shorthand Reporter in and for the States of Arkansas, Oklahoma, Missouri, Illinois, Tennessee, Georgia, New Mexico, Washington, and California; National Registered Professional Reporter; National Registered Merit Reporter; National Registered Diplomate Reporter; Notary Public.

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A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFFS (VIA ZOOM):
ALEX KAPLAN, ESQUIRE
OPPENHEIM ZEBRAK, LLP
461 5TH AVENUE, 19TH FLOOR
NEW YORK, NEW YORK 10017
212-951-1156

ON BEHALF OF THE DEFENDANT (VIA ZOOM):
SONAL MEHTA, ESQUIRE
LAKSHMI REDDY, ESQUIRE
WILMER CUTLER PICKERING HALE AND DORR LLP
2600 EL CAMINO REAL, SUITE 400
PALO ALTO, CALIFORNIA 94306
650-858-6000

ALSO PRESENT:
PATRICK OGILBY, ESQUIRE
NICHOLAS TARDIF, ESQUIRE
TRAVIS PERRY, REMOTE TECHNICIAN
BRAD SYDORICK, VIDEOGRAPHER

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PROCEEDINGS

THE VIDEOGRAPHER: Here begins Media No. 1 one in the videotaped deposition of Kent Draughon, in the matter of Concord Music Group v Anthropic, in the United States District Court, Northern District of California, San Jose Division, Case Number 24-CV-03811-EKL(SVK).

Today's date is November 5, 2025, and the time on the video monitor is 9:02 a.m. central Standard time.

The remote videographer today is Brad Sydorick representing Planet Depos. And all parties of this video deposition are attending remotely.

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

MS. MEHTA: Yes, good morning. Sonal Mehta from WilmerHale on behalf of Anthropic. With me today is my colleague Lakshmi Reddy.

MR. KAPLAN: And this is Alex Kaplan from Oppenheim + Zebrak representing plaintiffs in this case and representing the witness and his company. Also on the Zoom video, although he won't be speaking, is Patrick Ogilvy who is in-house counsel with CCMG.

THE VIDEOGRAPHER: The court reporter today

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is Karisa Ekenseair representing Planet Depos. And the witness will now be sworn.

THE REPORTER: My name is Karisa Ekenseair. I am a California Certified Shorthand Reporter, License Number 14546.

Would the witness please raise their right hand and be sworn.

KENT DRAUGHON

of lawful age, being first duly sworn, deposes and says in reply to the questions propounded as follows:

EXAMINATION

BY MS. MEHTA:

Q Good morning, Mr. Draughon.

A Good morning.

Q My name is Sonal Mehta. I am a lawyer representing Anthropic in this matter. It's nice to meet you.

A Nice to meet you.

Q Could I ask you state your full name and address for the record, please?

A Yes. Kenton Boyd Draughon, and I live [redacted]

Q And would you state your business address for the record as well? Thank you.

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A Yes. It's 1234 Martin Street, in Nashville, Tennessee 37203. We're in Suite 300.

Q Thank you. Have you ever been deposed before?

A Yes, I have.

Q How many times?

A Twice before.

Q What kind of cases were those in?

A The first was a medical malpractice case. The second was a copyright case.

Q Was type of copyright case was it?

A Yes. It was a copyright infringement complaint.

Q And was -- were you with Capitol Christian Music Group at the time of that deposition?

A Yes, I was.

Q And was Capitol Christian Music Group the plaintiff in that case?

A No, we were not.

Q You were the defendant or were you a third party?

A We were named with defendants.

Q Okay.

A Is the way to say that.

Q Okay. And what was the allegation of

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[redacted]

Q (Technical disruption) the music industry, Mr. Draughon?
A I'm sorry, your audio cut out there. What was that?
Q I'm sorry. Just how long have you worked in the music industry?

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A Been blessed to do this for more than 30 years now.
Q In your 30 years of experience in the industry, have you -- do you think it's typical for songwriters to copyright lyrics separately from the rest of the musical composition?
MR. KAPLAN: Form objection; and scope.
A Just stating that back to you. Did you ask do I think it's typical --
Q Yes.
A -- of writers to register lyrics separate from melody? I do not think it's typical.

[redacted]

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[redacted]

Q If we could, let's go to Exhibit 5 which will be -- and we'll come back to your declaration at different points through the day today, so you might want to leave that one handy.
MS. MEHTA: But I'm going to go ahead and mark as Exhibit 5 Tab 13, please.
REMOTE TECHNICIAN: Yes. One moment.

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(Exhibit 5 marked for identification.)
REMOTE TECHNICIAN: Should be in the Chat now.

[redacted]

CERTIFICATE OF SHORTHAND REPORTER

I, Karisa Ekenseair, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my direction; that reading and signing was requested; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal this 9th day of November, 2025.



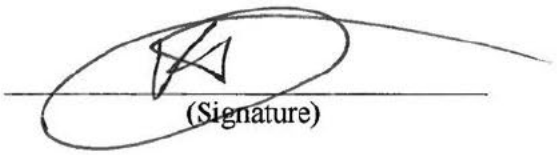
Karisa Ekenseair, CCR RPR RMR RDR
CA CCR #14546

No. 606143

Re: Deposition of Kent Draughon, Designated Representative
Date: 11/5/2025
Case: Concord Music Group -v- Anthropic
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Page	Line	Correction/Change and Reason
12	11	Change "was" to "what"; Mistranscription
13	7	Change "Waymaker" to "Way Maker"; Mistranscription
15	5	Change "Waymaker" to "Way Maker"; Mistranscription
34	2	Add "off" to beginning of answer, before "the"; Clarification
31	9	Change "Marsh" to "March"; Clarification
47	12	Change first "control" to "controls"; Clarification
63	8	Add "the" after "broadly,"; Clarification
84	2	Change "versus" to "various"; Mistranscription
116	4	Change "heaving" to "heaven"; Mistranscription
134	5	Add "off" to beginning of answer, before "the"; Clarification
158	21	Change "rules" to "rolls"; Mistranscription
189	14	Change "non Capital" to "non Capitol"; Mistranscription

12/17/25
(Date)


(Signature)

No. 606143

Re: Deposition of **Kent Draughon, Designated Representative**
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ACKNOWLEDGMENT OF DEPONENT

I, Kent Draughon, Designated Representative, 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.

12/17/25 (Date)

(Signature)