EXHIBIT 2

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

- - - - - - - - - - - - - - -x
CONCORD MUSIC GROUP, INC., ET AL., : Civil Action No.
Plaintiffs, : 5:24-cv-03811-EKL
v. : SVK
ANTHROPIC PBC, :
Defendant. :
- - - - - - - - - - - - - - -x

Videotaped Deposition of JEFFREY BILMES, Ph.D.
* * * HIGHLY CONFIDENTIAL * * *
* * * ATTORNEYS' EYES ONLY - SOURCE CODE * * *
Seattle, Washington
Friday, March 6, 2026
9:00 a.m.

Job No.: 620607
Pages: 1 - 255
Reported By: Connie Recob, CCR 2631, RMR, CRR

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Deposition of JEFFREY BILMES, Ph.D., held at the offices of:

Cooley LLP
1700 Seventh Avenue, Suite 1900
Seattle, Washington 98101

Pursuant to notice, before Connie Recob, CCR 2631, RMR, CRR, Notary Public in and for the State of Washington.

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A P P E A R A N C E S

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Ian Chen - Anthropic PBC

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Exhibit 322	AI Model & API Providers Analysis|Artificial Analysis	57
Exhibit 323	Don McLean Lyrics, Bates No. Plaintiffs_0000000564	204

WITNESS INSTRUCTED NOT TO ANSWER
Pages 247-248

INFORMATION REQUESTED
(None)

P R O C E E D I N G S

(Exhibit Nos. 319-321 marked for identification.)

THE VIDEOGRAPHER: Here begins the videotaped deposition of Professor Jeffrey Bilmes, in the matter of Concord Music Group, Incorporated, et al., versus Anthropic PBC, in the United States District Court, Northern District of California San Jose Division, Case No. 5:24-cv-03811-EKL-C -- or SVK.

Today's date is March 6th, 2026. The time on the video monitor is 9 o'clock Pacific time. The videographer for today is Parker Simpson representing Planet Depos, headquartered at 451 Hungerford Drive, Suite 400, Rockville, Maryland 20850.

This video deposition is taking place at Cooley LLP, Seattle, 1700 Seventh Avenue, Suite 1900, Seattle, Washington 98101.

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

ATTORNEY MILLER: Corey Miller from O+Z LLP for the music publisher plaintiffs. Also

present on the Zoom with me is my colleague, Tim Chung.

ATTORNEY GOOCH: Taylor Gooch for WilmerHale. Also with me in the room is our client's in-house attorney, my colleague Ellen Stephano and the witness on behalf of Anthropic.

THE VIDEOGRAPHER: And the court reporter today is Connie Recob representing Planet Depos.

The witness will now be sworn.

JEFFREY BILMES, Ph.D., having been first duly sworn, deposed and testified as follows:

EXAMINATION

BY ATTORNEY MILLER:

Q Good morning, Professor Bilmes.

A Good morning.

Q My name is Corey Miller and I'll be taking your deposition today. Have you ever been deposed before?

A No, I haven't.

Q So let me just briefly walk through how today is going to proceed. I'll be asking you questions and it's your job to answer my questions

as truthfully and completely as you can.

From time to time your counsel may object. Even if he objects, you still have to answer my questions unless he specifically instructs you not to answer.

Do you understand that?

A Yes.

Q We have a court reporter here today who is writing down everything we say so that there's a record of today's proceedings. For her benefit, it's very important that you give verbal answers to questions. Shakes of the head or "uh-huhs" or that kind of thing don't produce a clear record of what your answer was so I'll ask that you give verbal answers.

Similarly, if we talk over each other, it makes it much harder for the court reporter to create a clear record, so I'll ask that you wait until I finished asking my question before answering and in return I will try to wait until you finished answering my question before asking the next question.

Does that make sense?

A Yes.

Q If you do not understand a question that I

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you could think of as distortions. And there could be various different amounts of each one of these various different types of distortions.

So the first part of your question is a hypothetical, which would not be something necessarily -- that would not be something possibly to define or even do because of all of those things.

Secondly -- so the second part of your question was what would be the consequence of doing something that is effectively impossible to do. So the consequence -- let's say that we are in a universe where the impossible is possible. And then the model, Anthropic's Claude, because the training data has changed, would behave differently.

Now, the reason is because this goes back to what we were saying a little bit earlier that, especially when you have models as powerful as state-of-the-art large language models deployed by commercial entities such as OpenAI, Google, Anthropic and other entities that have the abilities to produce these large models, one never really knows the effect that one piece of data has on everything else that the model does. One knows

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that the model behaves differently. One knows that every training data can change the billions of floating point numbers -- floating point numbers that comprise the underlying model's parameters. And the resulting model is different. It will behave differently.

And it's very counterintuitive at first, because one might think, as an example, that a recipe for, say, lasagna would have no effect on one's ability to get instructions on how to fix a carburetor in a car, but if you removed that recipe for lasagna, it's the case that the precise mechanism that goes into producing the instructions for fixing a carburetor on a car would be different even though these two concepts to us humans, to us people, who would not think of those two things as being related to each other, would not find a lasagna recipe useful for fixing a car.

These models work in very complicated ways, and the community is collectively working really, really hard and really hard to try to understand precisely mathematically how are they doing what they are doing.

There are some theories. Most of the

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theories that I've seen are based on tiny little chunks of the model. So as good as the existent mathematical theories are, they're theories about a very small chunk. They're theories about the small -- and they themselves would be first to admit that, despite their underlying mathematics being correct, they don't know if their theories and their results would themselves still apply once you scale up those results to the sized models that -- you know, Claude or ChatGPT or any of the models that, you know, comprise the state-of-the-art large language models are.

So therefore, getting back to your question, if all of the copies of the works in suit were removed from the training data, how would it affect the resulting model or would it effect the resulting model? I can't remember which of those two variants it was. But both sides of those questions, to really accurately answer it would need to be teased apart.

First is really the infeasibility and impossibility of doing the first part. And secondly, the fact that any piece of data can have an effect on any other ability that the model might possess. And it's -- it's quite remarkable.

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I mean, it really is.

Q Do you disagree that the effect of Plaintiffs' lyrics on Claude's performance is extremely likely to be near zero?

ATTORNEY GOOCH: Objection. Asked and answered.

THE WITNESS: I'm sorry. Might you -- would you mind rephrasing the question?

BY ATTORNEY MILLER:

Q Do you agree that the effect of Plaintiffs' lyrics on Claude's performance is extremely likely to be near zero, if present at all?

ATTORNEY GOOCH: Objection. Asked and answered.

THE WITNESS: My understanding is that not just lyrics, but every piece of data, every iota of data has some effect. It might be extremely small, but every piece of data has some effect on the model's behavior.

The models can do so many things in so many different ways that changing the data in any way changes the model.

BY ATTORNEY MILLER:

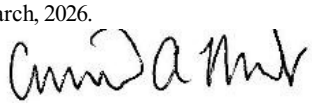
Q If you turn to Paragraph 328 of your

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REPORTER'S CERTIFICATE

I, CONNIE A. RECOB, the undersigned Certified Court Reporter, authorized to administer oaths and affirmations in and for the States of Washington, Oregon, Utah and Idaho, do hereby certify that the sworn testimony and/or proceedings, a transcript of which is attached, was given before me at the time and place stated therein; that any and/or all witness(es) were duly sworn to testify to the truth; that the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript; that a review of which was requested; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND and SIGNATURE this 10th day of March, 2026.



_____

/s/CONNIE A. RECOB, RMR, CRR
Washington CCR No. 2631

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DEPOSITION ERRATA SHEET

Our Assignment No. 620607
Case Caption: CONCORD MUSIC GROUP vs. ANTHROPIC

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the _____ day of _____, 2026.

_____
JEFFREY BILMES, Ph.D.

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DEPOSITION ERRATA SHEET

Page No._____Line No._____Change to:_____
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SIGNATURE:_____DATE:_____
JEFFREY BILMES, Ph.D.

ERRATA TO THE DEPOSITION TRANSCRIPT OF
JEFFREY BILMES, PH.D.
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
11	4	"analysis" to "analyses"	Transcription Error
13	9	"at" to "of"	Transcription Error
14	2-3	"microelectronic machines. It's various" to "Micro-Electro-Mechanical System (MEMS). It uses various"	Transcription Error / Clarification
14	5-6	"electrical computing engineering department are to think" to "electrical and computer engineering department is to think"	Transcription Error
14	13	"microelectronic machine" to "Micro-Electro-Mechanical Systems"	Transcription Error / Clarification
14	19	"computing" to "computer"	Transcription Error
16	1	Omit "and"	Transcription Error
39	20	".xlxs" to ".xlsx"	Transcription Error
42	18	"hallucination" to "LLMs"	Clarification
49	10	"number" to "model"	Transcription Error
82	24	Omit "me hear"	Transcription Error
90	16-17	"not that one would ever want." to "not one that one would ever want."	Transcription Error
94	18-19	"four bad bananas" to "two bad bananas"	Transcription Error
103	21	"train 2 raised" to "train models 2 raised"	Transcription Error
103	22	"16 trillionth" to "16 trillionth models"	Transcription Error
104	3	"2 to the 100" to "10 to the 100"	Clarification
106	22	"diverse" to "diversity"	Transcription Error

ERRATA TO THE DEPOSITION TRANSCRIPT OF
JEFFREY BILMES, PH.D.
TAKEN ON **March 6, 2026**

PAGE	LINE(S)	CHANGE	REASON FOR CHANGE
106	23	"reverse" to "diverse"	Transcription Error
107	10	"lease" to "less"	Transcription Error
130	22	"enumerable" to "innumerable"	Transcription Error
141	11	"predomics" to "proteomics"	Transcription Error
171	20	"tension" to "attention"	Transcription Error
171	21	"perception" to "perceptron"	Transcription Error
177	7	"possibly" to "possible"	Transcription Error
178	2	"every training data" to "every piece of training data"	Transcription Error
179	17	"effect" to "affect"	Transcription Error
200	19	"tamber" to "timbre"	Transcription Error
237	13	"AP" to "REP"	Transcription Error
242	3	"Komi" to "inktomi"	Transcription Error

I, **JEFFREY BILMES, PH.D.,** read the foregoing deposition and hereby state that the foregoing is true and correct, except as noted herein.

Jeffrey Bilmes, Ph.D.

04/09/2026
Date