EXHIBIT 4

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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
DEPOSITION of
RUSS ALTMAN, Ph.D., M.D.
Palo Alto, California 94306
Friday, February 27, 2026

Reported Stenographically by:
MARY J. GOFF
CSR No. 13427
WA CSR No. 21030779
Job No. 620592
PAGES 1-309

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HIGHLY CONFIDENTIAL--ATTORNEYS' EYES ONLY

VIDEOCONFERENCED and VIDEO-RECORDED DEPOSITION of RUSS ALTMAN, Ph.D., M.D., Volume I, taken on behalf of Plaintiff Music Publishers, Oppenheim + Zebrak, LLP, at WilmerHale, 2600 El Camino Real, Suite 400, Palo Alto, California 94306, beginning at 9:05 a.m. and ending at 6:37 p.m., on Friday, February 27, 2026, before MARY J. GOFF, California Certified Shorthand Reporter No. 13427 and WA CSR No. 21030779.

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APPEARANCES:

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ALSO PRESENT: Natalie Naugle, in-house counsel Anthropic
Videographer: Philip Astor

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THE VIDEOGRAPHER: Here begins Media Number 1 in the videotaped deposition of Russ Altman, in the matter of Concord Music Group versus Anthropic, in the United States District Court, Northern District of California, San Jose Division, Case Number 5:24-cv-03811-EKL (SVK).

Today's date February 27, 2026. The time on the video monitor is 9:05 a.m. The videographer today Phillip Astor, representing Planet Depos. This videotaped deposition is taking place at 2600 El Camino Real, Suite 400, Palo Alto, California.

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

ATTORNEY MILLER: Corey Miller from Oppenheim + Zebrak LLP on behalf of the Plaintiff Music Publishers.

ATTORNEY HOLTZBLATT: Ari Holtzblatt from WilmerHale, representing Anthropic.

ATTORNEY NAUGLE: And Natalie Naugle from Anthropic.

THE VIDEOGRAPHER: The court reporter today is Mary Goff, representing Planet Depos. The witness will now be sworn.

THE COURT STENOGRAPHER: My name is Mary Goff. I am a California Certified Shorthand Reporter, CSR Number 13427. Today's proceedings are being captured by stenographic means.

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RUSS ALTMAN, Ph.D., M.D.,
Being first duly sworn or affirmed to testify to the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION

BY ATTORNEY MILLER:

Q Good morning, Dr. Altman. My name is Corey Miller, and I'll be taking your deposition today.

Have you ever been deposed before?

A Yes.

Q How many times?

A Once.

Q When was that?

A More than -- more than 10 or 15 years ago in a medical matter.

Q All right. So let me just then, to refresh your memory, walk through a few of the ground rules for how today will proceed. I will be asking you questions, and it's your job to answer my questions as -- truthfully.

From time to time your counsel my object

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to preserve his objections for the record. However, even if he objects, you still have to answer my questions, unless he specifically instructs you not to.

Do you understand that?

A Yes.

Q Okay. We have court reporter today who is recording everything we say, so for her benefit, it's very important that you give verbal answers. Shakes of the head, you know, "uh-huhs," or that kind of thing don't leave a clear record of what your answer was, so please try to answer with verbal answers.

A Okay.

Q Similarly, it makes for -- a court reporter's job much for difficult if we talk over each other, so I'll try to do my best to allow you to finish your answer before asking my next question, and in exchange, I'll ask that you wait until I have completed asking my question before you begin your answer.

A Okay.

Q If you do not understand a question that I ask you, please ask me to clarify it and I will try do so. If you answer my question, I will assume

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A It is context-dependent as -- as --
THE DEPONENT: Sorry.
THE VIDEOGRAPHER: Sorry. Can you just clip it on your right lapel?
THE DEPONENT: Right lapel?
THE VIDEOGRAPHER: Yes.
THE DEPONENT: I'm now putting my microphone on my right lapel. And now I'm going to have to ask you to repeat the question.
Q (BY ATTORNEY MILLER) What does human oversight verification and auditing require?
A So that is a context-specific question. The answer about appropriate oversight, verification, and auditing -- excuse me.
The appropriate human oversight, verification, and auditing depends on the situation. In that sentence I was referring to myself as a user of these models and tools, and so as I am a user in different roles, I apply different oversight, verification, and auditing approaches.
Q All right. Could you turn to paragraph 54 of the document you have in front of you, please?
A This is paragraph 54 of my -- of my expert reply report.
Q Yes.

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A Yes, I have it.
Q And in paragraph 54, you state that, "The value of any individual class of training material, including song lyrics" -- oops. That's what it says, but that's not what I meant to be -- withdrawn. Ah. Turn to paragraph 53.
A Okay.
Q I'm sorry.
A I'm now looking at 53.
Q This. And do you see the third sentence in paragraph 53 states that:
"LLMs derive their capabilities from training on and exposure to vast amounts of heterogeneous text pulled from diverse sources, reflecting the full range of human language use, including creative, metaphorical, and nonstandard expressions"?
A Yes.
Q Do you consider song lyrics to be creative, metaphorical, and nonstandard expressions?
A Lyrics certainly can be that, yes.
Q Now I want you to turn to paragraph 54.
A Okay.

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Q And in paragraph 54, you state that:
"The value of any individual class of training material, including song lyrics, cannot be evaluated in isolation, but must be viewed as part of a broader ecosystem of language data that collectively supports generalization and responsible use."
Do you see that?
A Yes.
Q Is it important that Anthropic include -- let me take -- withdrawn. Let me take a step back.
You understand that the copyrighted works that are at issue in this litigation are song lyrics?
A I -- yes, I have a rough understanding that song lyrics and copyright issues are at stake in this case, yes.
Q Is it important that Anthropic include the -- the song lyrics at issue in this case in Claude's training data?
ATTORNEY HOLTZBLATT: Objection, vague.
A Could you repeat the question?

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Q (BY ATTORNEY MILLER) Is it important that Anthropic include the song lyrics at issue in this case in Claude's training data?
A So I did not -- as you know, I did not train Claude, and I really can't that question.
In general, they -- it constitutes text, but the strategies by which Anthropic decided to include or not to include things in its training are opaque to me, and I do not know them.
Q Would Claude be less effective if its training data did not include the song lyrics at issue in this case?
A Unless that's been specifically tested, that's an empirical question that I don't know the answer to.
Q Do you agree that lyrics, as text, do not constitute high-quality datasets for general-purpose LLM training, as they lack lexical diversity in factual information?
A That was a mouthful, so I'm going to ask you to repeat the question. I'll listen even more carefully.
Q Do you agree that lyrics, as text, do not constitute high-quality datasets for general-purpose LLM training, as they lack lexical diversity and

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companies?
A Risk mitigation is a tool kit that should be available not to -- to all players in the AI ecosphere. So companies, of course, should have -- and I say companies, in plural.
All companies should have risk mitigation strategy capabilities, but individual users should have a -- risk mitigation capabilities such as the doctors who might be using an LLM to evaluate patient data.
Communities of users like the sets of doctors at a hospital might come up with best practices, and teachers might come up with sets of best practices. So it's the -- it's the companies. It's the users. It's the community of users.
And then, of course, it's the government, which has a number of knobs they can turn with respect to risk mitigation such as creation of regulations.
So -- so the risk mitigation ecosphere involves much more than one company, but all of those communities and -- that I just outlined.
Q And to what extent would you need to look at all of those levels in assessing whether foreseeable risks can be minimized and managed?

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A I believe I said in my expert report that it's absolutely critical to consider all of those because they all have different capabilities. They all have different expenses. They all have different timescales of -- in which they can be applied.
And so a prudent -- a prudent society, because this is a societal challenge, would -- would allow and expect all of those constituencies to have both individual and overlapping mitigation strategies.
ATTORNEY HOLTZBLATT: Okay. Nothing further for me.
ATTORNEY MILLER: Nothing further for me. Thank you, Dr. Altman.
A Thank you.
THE VIDEOGRAPHER: This marks the end of the deposition of Dr. Russ Altman. We are going off the record 18:37 p.m.

(TIME NOTED: 6:37 p.m.)

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I, RUSS ALTMAN, Ph.D., M.D., do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.
EXECUTED this_____ day of_____,
20____, at_____, _____.
(City) (State)

_____
RUSS ALTMAN, Ph.D., M.D.

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I, MARY J. GOFF, CSR No. 13427, Certified Shorthand Reporter of the State of California, certify;
That the foregoing proceedings were taken before me at the time and place herein set forth, at which time the witness declared under penalty of perjury; that the testimony of the witness and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed under my direction and supervision; that the foregoing is a full, true, and correct transcript of my shorthand notes so taken and of the testimony so given;
That before completion of the deposition, review of the transcript ( ) was (xx) was not requested: ( ) that the witness has failed or refused to approve the transcript.
I further certify that I am not financially interested in the action, and I am not a relative or employee of any attorney of the parties, nor of any of the parties.
I declare under penalty of perjury under the laws of California that the foregoing is true and correct, dated this 2nd day of March, 2026.

Mary J. Goff
MARY J. GOFF