EXHIBIT 11

(FILED UNDER SEAL)

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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., : Civil Action No. 5:24-cv-03811-EKL-SVK

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

HIGHLY CONFIDENTIAL
ATTORNEYS' EYES ONLY

VIDEOCONFERENCED (HYBRID) AND VIDEO-RECORDED

DEPOSITION OF DEFENDANT ANTHROPIC PBC

PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)

BENJAMIN MANN

San Francisco, California

Thursday, November 20, 2025

9:03 a.m. Pacific Standard Time

VOLUME I

Job No. 609867

Pages: 1 - 228

Reported By: April L. Crites, RMR, CRR, CSR, CCR

California Certified Shorthand Reporter

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DEPOSITION OF BENJAMIN MANN

HELD AT THE OFFICES OF:

WILMER CUTLER PICKERING HALE and DORR, LLP

50 California Street

Suite 3600

San Francisco, California 94111

(628) 235-1000

* * *

Pursuant to notice, and pursuant to the Federal Rules of Civil Procedure, before April L. Crites, RMR, CRR, CSR, CCR, and California Certified Shorthand Reporter No. 14493.

* * *

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EXHIBITS

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Exhibit 82	Page Vault: Acceptable Use Policy\Anthropic, Bates stamped Anthropic_000013675 through Anthropic_0000013679	205
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Exhibit 121	Excel spreadsheet, thedailybeast.com, 32,937 rows, Bates stamped Anthropic_217164	220
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Exhibit 189	Anthropic, PBC, employee handbook, effective April 15th, 2021, Anthropic_0000429433 through Anthropic_0000429458	74
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THE VIDEOGRAPHER: Here begins media number 1 in the videotaped deposition of Benjamin Mann in the matter of Concord Music Group v. Anthropic in the United States District Court for the Northern District of California, San Jose Division, case number 24-CV-03811-EKL.
Today's date is November 20, 2025.
The time on the video monitor is 9:04.
The videographer today is Philip Astor, representing Planet Depos.
This video deposition it taking place at Wilmer Cutler Pickering Hale & Dorr, LLP, San Francisco, California.
Would counsel please voice-identify themselves and state whom they represent?
MR. MILLER: Corey Miller from Oppenheim + Zebrak, LLP, on behalf of the plaintiff, Music Publishers.
Also with me is Michelle Gomez-Reichman and Nick Hailey, both from Oppenheim + Zebrak.
MS. MEHTA: Good morning. Sonal Mehta from WilmerHale on behalf of Anthropic and the witness.
With me today is my colleague Taylor Gooch, and on the Zoom, my colleague Jared Grubow.

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We also have in the room in-house counsel at Anthropic, Devon Hanley Cook, and then we have Sara Sampoli from Latham & Watkins on the Zoom, as well.
THE VIDEOGRAPHER: The court reporter today is April Crites, representing Planet Depos.
The witness will now be sworn.

BENJAMIN MANN

of lawful age, Witness herein, having been first duly cautioned and sworn, as hereinafter certified, was examined and said as follows:

CROSS-EXAMINATION

BY MR. MILLER:

Q Good morning, Mr. Mann.
A Good morning.
Q My name is Corey Miller, and I represent the plaintiff music publishers in this case, and I'll be taking your deposition today.
I just want to walk through a few quick ground rules that will hopefully make the deposition proceed a little more smoothly.
I'll be asking you questions, and you'll be answering my questions. Because we have a court reporter here who's transcribing everything we say, it's important that you give verbal

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answers so that there's a record of your answer.
Shaking your head or -- or nodding or things like "uh-huh" don't leave a clear record of what your answer was, so please try to give verbal answers.
Similarly, it makes the court reporter's job very difficult if we talk over each other. So I will do my best to allow you finish answering your question -- excuse me -- to allow you to finish answering my question before answering [sic] my next question, and in return, I will ask that you wait until I've finished my question to answer the question.
Does that make sense?
A Yes.
Q All right. From time to time today, your counsel may object to preserve her objection for the record. Just because your counsel objects, you still have to answer the question, unless your counsel specifically instructs you not to answer the question.
Do you understand that?
A Yes.
Q Okay. If you do not understand a question I ask, please ask me to clarify it, and I will do

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my best to do so. If you answer my question, I will assume you understood it.
Does that make sense?
A Yes.
Q We can take breaks today. If you ever want to take a break, just say so, and we'll be happy to take one. I'll just ask that if there's a question pending, you answer the question before we go off the record. Okay?
A Yes.
Q Do you understand that you have just taken an oath to tell the truth, the whole truth, and nothing but the truth?
A Yes, I do.
Q And that -- you understand that's the same oath you would take if we were sitting in a courtroom before a judge and jury, right?
A Yes.
Q Is there any reason you cannot testify in accordance with that oath today?
A There's no reason.
Q Okay. Are you taking any medication that would interfere with your ability to testify in accordance with your oath?
A No.

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A Yes.
MR. MILLER: Tab 40.
(Plaintiffs' Exhibit 196, Excel spreadsheet, hyperlinked in Exhibit 195, Bates stamped Anthropic_0000240674, was marked and presented for purposes of identification.)
BY MR. MILLER:
Q In the Zoom, you should see what's being marked as Plaintiffs' Exhibit 196, which bears the Bates number Anthropic_240674.
A I see that.
Q And do you recognize this document?
MS. MEHTA: Objection to the form. Outside the scope.
THE WITNESS: I don't specifically recognize this document, but I'm familiar with documents in this format.
BY MR. MILLER:
Q And what type of document does this appear to be to you?
MS. MEHTA: Objection to the form. Foundation. And scope.
THE WITNESS: This appears to be a document representing some crowd worker judgments on whether the model was supposed to refuse, and

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then whether it did refuse, to give information on various topics.
BY MR. MILLER:
Q Is this the document referenced in the previous exhibit we looked at that Craig provided a link to in the Slack communication?
MS. MEHTA: Objection to the form. Scope. Foundation. And speculation.
THE WITNESS: Given that Craig's message said that there were 988 examples, and this spreadsheet does not contain 988 examples, I would be surprised if this was the same document.
BY MR. MILLER:
Q How many examples are in this spreadsheet?
MS. MEHTA: Same objections.
THE WITNESS: 894 rows, but the first row is a header, so I guess 893.
BY MR. MILLER:
Q Okay. Are you familiar with something called Hugging Face?
A Yes.
Q Is Hugging Face a platform where members of the machine-learning community can collaborate on models, datasets, and applications?
MS. MEHTA: Form.

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THE WITNESS: Hugging face is multiple things; it's an emoji; it is a company; and it is also the platform that the company provided matching the description you mentioned. Possibly, there are other definitions.
BY MR. MILLER:
Q Has Anthropic made certain datasets available on Hugging Face?
MS. MEHTA: Form.
THE WITNESS: I believe we have.
MR. MILLER: Tab 41.
(Plaintiffs' Exhibit 197, Anthropic/hh-rlhf - Datasets at Hugging Face, was marked and presented for purposes of identification.)
MR. MILLER: Is this 197?
BY MR. MILLER:
Q In the Zoom, you should see what's been marked as Plaintiffs' Exhibit 197.
Does Plaintiffs' 197 appear to be a screenshot of the Hugging Face website?
MS. MEHTA: Objection to the form. Foundation.
THE WITNESS: I'm seeing that there are six pages, but the scrolling is not working.

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Oh, there it goes.
MS. MEHTA: Do you want him to allow the security warning or not?
THE WITNESS: It's frozen.
MS. GOMEZ-REICHMAN: You just opened a URL, so let me take control back for a moment. No problem.
THE VIDEOGRAPHER: Alt-shift-G.
MS. GOMEZ-REICHMAN: Let me re-share this, and hopefully, we won't have an URL open this time.
Okay.
THE WITNESS: Where should I see the exhibit number?
BY MR. MILLER:
Q It's not visible on the face of the document.
A Should there be a Bates number?
Q There is not. But do you see, at the bottom-left corner of the first page, there's a URL?
A Yes.
Q And the URL indicates that this is a PDF reflecting a website on the Hugging Face domain?
MS. MEHTA: Counsel, are you representing

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that you printed this, and this is a complete and accurate copy of this URL?
MR. MILLER: Yes, I can represent that.
MS. MEHTA: Okay.
THE WITNESS: So what's your question?
BY MR. MILLER:
Q Does this appear to you to be a PDF created to reflect Anthropic's helpfulness and harmlessness datasets available -- let me try that again.
Does this appear to be a PDF created reflecting Anthropic's web page on Hugging Face, where it makes available datasets related to Anthropic's helpfulness and harmlessness analysis from reinforcement learning from human feedback?
MS. MEHTA: Objection to the form.
THE WITNESS: It does appear to be a printout of Anthropic's hh-rlhf dataset.
BY MR. MILLER:
Q Okay. Could you turn to page 3, please?
A Yes.
Q You see, at the top of page 3, this web page states, This repository provides access to two different kinds of data.
A Yes.

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Q And then underneath that, there's a number 1.
A Yes.
Q And the web page states, Human preference data about helpfulness and harmlessness from training a helpful and harmless assistant with reinforcement learning from human feedback.
Do you see that?
A Yes, I do.
Q Training a helpful and harmless assistant regarding reinforcement of human feedback was the title of the research paper we just looked at a minute ago, right?
A Correct.
Q So is the data that Anthropic is making available here the data underlying the research reflected in that paper?
MS. MEHTA: Objection to the form. Foundation.
THE WITNESS: There's a lot of research reflected in that paper, and I believe the paper specifically refers to a dataset that would be made available as part of the paper release. So the data represented on this website would be whatever the paper is referring to.

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BY MR. MILLER:
Q Okay.
MR. MILLER: Tab 48.
(Plaintiffs' Exhibit 198, Excel spreadsheet, 2025.11.20 Huggingface_Anthropic_Train, 160800 rows listed, was marked and presented for purposes of identification.)
BY MR. MILLER:
Q In the Zoom, you should see what's being marked as Exhibit 19 -- excuse me -- Exhibit 198.
MS. MEHTA: Could you add that to the chat? I don't have --
MS. GOMEZ-REICHMAN: Yeah. It's taking a second to come through. It's quite a large file.
MR. MILLER: It's a very large data file.
MS. MEHTA: Give it a second. I need to access it. It's still downloading for me.
Okay. Great. I'm all set.
BY MR. MILLER:
Q Mr. Mann, does what's been marked as Plaintiffs' Exhibit 198 appear to be the dataset we were just referring to?
MS. MEHTA: Objection to the form. Outside the scope. And also, calls for

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speculation. Lacks foundation.
THE WITNESS: This looks like a dataset. I don't remember, in particular, if this is the one.
BY MR. MILLER:
[redacted]
MS. MEHTA: Object -- objection to the form.
[redacted]
MR. MILLER: Okay. Can we take a break?
MS. MEHTA: How long have we been going?
MR. MILLER: A little over an hour.

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A The paragraph starting with "Except"?
Q Yes.
Do you see that these terms of service state, Except as expressly authorized by Genius in writing, you agree not to modify, copy, frame, scrape, rent, lease, loan, sell, distribute, or correct -- create derivative works based on the service, or Genius content in whole or in part?
MS. MEHTA: Objection to the form. Outside the scope. Lacks foundation. And calls for speculation, as well as legal conclusions.
THE WITNESS: I see the writing that you're describing.
BY MR. MILLER:
Q I want to direct your attention to the next sentence, which says, In connection with your use of the service, you shall not engage in or use any data mining, robots, scraping, or similar data gathering or extraction methods.
Do you see that?
MS. MEHTA: All the same objections.
THE WITNESS: Yes, I do.
BY MR. MILLER:
Q Do you know whether the material from genius.com in the -- in the Common Crawl dataset

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reflected in the spreadsheet we were just looking at was collected in a manner that violated Genius' terms of service?
MS. MEHTA: Objection. All the same objections.
THE WITNESS: So Common Crawl has been around for a long time, and it's totally possible that the URLs that are in that spreadsheet came from before these terms of service, which were from 2020. And it's also possible that despite Genius having these policies, that they didn't properly enforce them by implementing robots.txt.
And, in general, for scraping services, it would be technically infeasible to read and understand every single site's terms of service in advance of doing scraping.
So I would say any web content provider would know that scraping is a thing, and without getting into any legal terms or definitions, just from a technical standpoint, I think there are very reasonable explanations that some pages from -- that appeared to come from the genius.com website might appear in a Common Crawl shard.
MS. MEHTA: Counsel, you're at -- you're at time, so we need to wrap up the 30(b)(6).

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Before we do that, we'll close that volume and mark that volume as highly confidential, attorneys' clients only, as per the protective order, and then we can start a new volume for the 30(b)(1) deposition.
THE VIDEOGRAPHER: Would you like to close now?
MS. MEHTA: Yes.
MR. MILLER: Yeah, we can close now.
You're not going to have any redirect?
MS. MEHTA: Nope.
MR. MILLER: Okay.
THE VIDEOGRAPHER: This marks the end of the deposition of Benjamin Mann, 30(b)(6).
We are going off the record at 16:03.
(The deposition was concluded at 4:03 p.m.)
* * *

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CERTIFICATE OF REPORTER

I, April L. Crites, RPR, RMR, CRR, CSR, the officer before whom the foregoing deposition testimony was taken, do hereby certify:
That before being examined, BENJAMIN MANN was by me duly sworn to testify to the truth, the whole truth, and nothing but the truth;
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 final disposition.
IN WITNESS WHEREOF, I have here unto subscribed my name this 24th of November, 2025.
My commission expires May 31, 2026:

April L. Crites, RPR, RMR, CRR, CSR
CA Certified Shorthand Reporter No. 14493