EXHIBIT 4

(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

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(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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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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BY MR. MILLER:
Q After publishers filed this lawsuit, did Anthropic stop including publishers' song lyrics in any datasets used to train Claude.
MS. MEHTA: Objection to the form.
And, Mr. Mann, you can answer that based on what's in the training data, but not based on any communications with counsel or actions taken at the direction of counsel.
THE WITNESS: I think, in order to make sure that I'm answering with the facts, the most useful thing is if you could produce the source code in question, and I could use that to definitively answer what actions we might have taken.
BY MR. MILLER:
Q Okay. So you're not able to answer that question without examining the source code directly?
MS. MEHTA: Objection to the form. Scope.
[redacted]

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[redacted]
BY MR. MILLER:
Q Does Anthropic consider it important to include song lyrics, generally, in Claude's training data?
A I would say, no, I don't think we view it as important to include lyrics.
Q Well, Anthropic wants Claude to understand what song lyrics are, right?
A I believe. And I believe we have expert testimony that corroborates outside -- outside expert --
MS. MEHTA: I'm going to caution you not to disclose any outside expert testimony.
THE WITNESS: Okay.
MS. MEHTA: Just focus on what Anthropic knows. You're being deposed here as a witness for the company, so you can testify as to that.
THE WITNESS: Thanks.
So taking a step back, I believe that even if we didn't have the lyrics themselves, there are enough -- there's enough content in all the different kinds of data that we collect that is

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about songs, about lyrics, about the process of creating songs, that Claude would continue to have a strong understanding of what song lyrics are, and that there are enough analogs to song lyrics, such as poems, that are completely different, many of which are public domain, that Claude would have no problem understanding what song lyrics are and how to write new ones without access to any of the lyrics indicated in this case, let alone outside of the case.
BY MR. MILLER:
Q If Claude doesn't consider it important to include song lyrics in Claude's training data, why does Anthropic include song lyrics in Claude's training data?
MS. MEHTA: Objection to the form.
THE WITNESS: Well, you -- you mentioned if Claude doesn't believe that it's important, I think you meant --
BY MR. MILLER:
Q Excuse me. I'll -- thank you. I'll rephrase.
If Anthropic doesn't consider it important to include song lyrics in Claude's training data, why does Anthropic include song lyrics in Claude's

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training data?
MS. MEHTA: Objection to form.
THE WITNESS: So, in general, as I mentioned, our goal is to train helpful, harmless, and honest models, and push the frontier of safety research so that humanity's transition from society today to one in which there's super-intelligent AI is a safe and beneficial one for humanity.
In order to do that, we need to train frontier models with the best capabilities from a knowledge/work standpoint, from a hard sciences standpoint. Many of our customers work on hard sciences, and we believe that if things go well, then this technology could transform people's lives for the better. Those are the kinds of things that we really care about, and we've talked about that in length at public.
Dario has this essay called Machines of Loving Grace in which he paints a picture of the positive future that we could get to if things go well. Those are the kinds of things that we are optimizing for.
If song lyrics happen to be widespread on the Internet and are not behind robots.txt, are

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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