EXHIBIT 107

1

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 - SUBJECT TO PROTECTIVE ORDER
REMOTELY CONDUCTED VIDEOTAPED DEPOSITION OF
MICHAEL CANDORE
MONDAY, NOVEMBER 3, 2025
8:53 A.M. CST

JOB NO.: 606685
PAGES: 1 - 326
REPORTED BY: KARISA EKENSEAIR, CCR RPR RMR RDR
CA CSR #14546

2

DEPOSITION OF MICHAEL CANDORE, 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.

3

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4

T A B L E O F C O N T E N T S

PAGE
STYLE AND NUMBER..... 1
APPEARANCES..... 3

WITNESS: MICHAEL CANDORE
EXAMINATION BY MS. MEHTA..... 8
EXAMINATION BY MR. GOULD..... 319
FURTHER EXAMINATION BY MS. MEHTA.... 321

CERTIFICATE OF REPORTER..... 326

EXHIBITS
(ATTACHED TO TRANSCRIPT)

NUMBER DESCRIPTION PAGE
EXHIBIT 1 PLAINTIFFS' RULE 26(A)(1) INITIAL DISCLOSURES.....11
EXHIBIT 2 SCREENSHOT OF BCGUARDIAN WEBPAGE.....57
EXHIBIT 3 DECLARATION OF MICHAEL CANDORE.....61
EXHIBIT 4 DECLARATION OF DAN SEYMOUR IN SUPPORT OF PLAINTIFFS MOTION FOR PRELIMINARY INJUNCTION.....62

5

EXHIBITS
(ATTACHED TO TRANSCRIPT)

NUMBER	DESCRIPTION	PAGE
EXHIBIT 5	PROMPT DATED NOVEMBER 28, 2023	191
EXHIBIT 6	DUCKDUCKGO CHAT SCREENSHOT, BATES NUMBER PLAINTIFFS_0000009382 THROUGH 9383, PROTECTED COPYRIGHTED MATERIAL	241
EXHIBIT 7	PROMPT SCREENSHOT, BATES NUMBER PLAINTIFFS_0000009395 THROUGH 9398, PROTECTED COPYRIGHTED MATERIAL	246
EXHIBIT 8	PROMPT CREATED OCTOBER 13, 2023	250
EXHIBIT 9	PROMPT QUERY, BATES NUMBER BCG_ID_11296 THROUGH 12642	255
EXHIBIT 10	EXHIBIT B, PROMPT QUERIES, BATES NUMBER BCG_ID_10009 THROUGH 10609	255
EXHIBIT 11	EXHIBIT C, PROMPT QUERIES	256
EXHIBIT 12	PROMPT DATED OCTOBER 13, 2023	258

6

EXHIBITS
(ATTACHED TO TRANSCRIPT)

NUMBER	DESCRIPTION	PAGE
EXHIBIT 13	PROMPT DATED OCTOBER 4, 2023	266
EXHIBIT 14	CLAUDE AI PROMPT, BATES NUMBER PLAINTIFFS_0000010035, PROTECTED COPYRIGHTED MATERIAL	280
EXHIBIT 15	EXHIBIT D TO THE SEYMOUR DECLARATION	286
EXHIBIT 16	PLAINTIFFS SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANT S INTERROGATORY NO. 6	293
EXHIBIT 17	PLAINTIFFS SUPPLEMENTAL OBJECTIONS AND RESPONSES TO DEFENDANT S SECOND SET OF INTERROGATORIES NOS. 3 4, HIGHLY CONFIDENTIAL ATTORNEYS EYES ONLY PORTIONS HIGHLIGHTED IN YELLOW	299

7

PROCEEDINGS

THE VIDEOGRAPHER: Here begins Media No. 1 in the videotaped deposition of Michael Candore in matter of Concord Music Group v Anthropic, PBC, in the United States District Court, Northern District of California, San Jose Division, Case No. 5-24-CV-03811-EKL-SVK.

Today's date is November 3, 2025. The time on the video monitor is 8:53 a.m. The remote videographer today is Sedrick Lampkins representing Planet Depos.

All parties of this video deposition are attending remotely. Would counsel please voice-identify themselves and state whom they represent.

MS. MEHTA: Good morning. Sonal Mehta from WilmerHale on behalf of Anthropic. With me is my colleague Lakshmi Reddy. And also on the Zoom today is Ian Chen, in-house counsel at Anthropic.

MR. GOULD: Jeff Gould from Oppenheim + Zebrak on behalf of the witness.

Just, Mike, if you want to hide your non video participants, you can on the screen, to see less noise.

THE VIDEOGRAPHER: The court reporter today

8

is Karisa Jane Ekenseair representing Planet Depos. The witness will now be sworn.

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

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

MICHAEL CANDORE

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. Candore.

A Good morning.

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

A Likewise.

Q Have you ever been deposed before?

A No, I have not.

Q So let's go through a few ground rules just to make sure that you and I are on the same page for the process for today. Okay?

A Uh-huh.

189

A Almost certainly, yes.
Q And I take it that you didn't produce all of those or you didn't attach all of those to your declaration, right?
A I don't believe that they're attached to the declaration. I don't know what's been produced in the litigation. Counsel will have all of the outputs.
Q Okay. So if the jury wanted to know how many times you tried to prompt Claude and ended up running into the copyright guardrails, that would be something that we would need to go and look at the information that you produced to counsel for, correct?
A Yes.
Q And if the jury wanted to know or the judge wanted to know how many times you prompted Claude, got the copyright guardrail notice, and then still got something that looked like song lyrics for the composition afterwards, can you quantify that?
A As I sit here today, no, I don't know that number with specificity. That number is at least one. It's presented here in as -- in paragraph 10, though I don't know, again, how pervasive that specific scenario may have been.

190

Q Can you recall any other scenario in which you prompted Claude using that language, got the copyright guardrail notice, and nevertheless got lyrics to the -- some lyrics to the composition or full lyrics to the composition?
A I don't recall another scenario exactly like this one. I believe this one actually included the copyright notice in response to the lyrics as well, so I don't recall another scenario exactly like this one. But I should qualify this by saying I clearly didn't look at each and every piece of output for the manual prompts. I looked at a lot of them, not every one of them. And the automated prompting, that went through the API, I wouldn't have looked at every one of those pieces of output either. So I can't say definitively that because I didn't see it, it doesn't exist.
Q Right. But you don't remember seeing any other instance like the one that you identified in this declaration; is that fair?
A That is fair, yes.
MS. MEHTA: Let's go to Tab 14 and we're going to mark that as Exhibit --
REMOTE TECHNICIAN: Five.
MS. MEHTA: Five.

191

Q And actually, while that's being pulled up, let me just ask you, Mr. Candore: What did you mean by automated prompting in that last exchange?
A Sorry, the prompting at scale, the prompting through the API.
Q Okay. So now you should have in a moment Exhibit 5.
(Exhibit 5 marked for identification.)
REMOTE TECHNICIAN: It is in Chat now.
A Okay. I have in it front of me.
Q So you'll see in Exhibit 5 a prompt created on November 18th, 2023, at 2:15:08 p.m.
Do you see that?
A I do, yes.
Q And that was before your declaration that was submitted in February 2024, right?
A Okay. Yes.
Q And it says, "Name: Michael Candore," and then it has, "E-Mail Address: m.candore@bcguardian.com."
Do you see that?
A I see that. Yes.
Q And then the model that you were using here is Claude 2.0, correct?
MR. GOULD: Object to form.

192

A Well --
MR. GOULD: Calls for speculation.
A Sure. I don't know what this document is. I haven't seen this before. I see that "Model_CF," the value is Claude-2.0. I will grant that, but I -- I'm not sure what this document is.
Q Okay. Fair enough. You did use Claude 2.0 at some point -- or Claude 2.0 during your work on this matter, right?
A I believe so, yes.
Q Okay. Now, go to the second page, if you would. And there's a prompt there that said, "The following is a conversation between a human and an AI Automation assistant." And then it says "Human: What are the lyrics to anti-hero by," and then it has person name."
Do you see that?
A I do, yes.
Q And then the next -- and that person name is -- is replaced with a character string. And then on completion it says, "Unfortunately, I cannot provide full lyrics due to copyright restrictions. However, I can summarize that 'Anti-Hero' by PERSON_NAME," with the character string, "touches on themes of self-criticism, insecurity, and struggling

193

with one's flaws." And it goes on to summarize the theme of the song.
Do you see that?
A Sorry, I'm just reading through it.
Q Yeah.
A Yes. I see this.
Q Okay. This was an example of a prompt in November of 2023, so before the declaration that you submitted.
A Right.
Q You prompted Claude with a prompt text that we talked about before, what are the lyrics to song title or composition title by performing title, and what you got was a copyright guardrail notification with no song lyrics, correct?
MR. GOULD: Object to form; and generally object to the nature of questioning on this document which doesn't have a Bates number, haven't represented what it is, and I think Mr. Candore said he's never seen it before.
MS. MEHTA: Sure. I'll make a representation. It comes from the 5 million sample of the Claude prompts and outputs that were produced and made available to your team, Mr. Gould.
Q So Mr. Candore, this is a prompt and output

194

that was provided by Anthropic as part of the litigation in response to a court order. And it includes the prompt and the output that you see here.
And my question is: This is an example of a prompt that follows that same format that we've talked about extensively today, what are the lyrics to song title or composition title by performing artist, and the response, the output you got was the copyright guardrail notice without any song lyrics, correct?
MR. GOULD: Objection to form; same objections.
A So I mean, excuse me, I would say it's a little bit difficult to answer that. So a qualifying question, first of all.
What are the lyrics to "Anti-Hero" by PERSON_NAME(40), is that a redaction or an anonymization which was completed by your team or Anthropic or someone else in the delivery of this, or is that -- what is that?
Q Yeah. That's an anonymization that was done in the delivery of it. So I will -- I will stipulate that you put in the name -- the name of the performing artist and all we've done is block

195

out the name of the performing artist in producing the sample --
A Okay.
Q -- consistent with what the court ordered. So it was "Anti-Hero," and then you put the performing artist's name in there.
A Okay.
Q And my question to you is: When you did that using the same format of prompt and output that we've talked about extensively today, the paragraph 7 prompt and output format, the format you used in January 2024, what you got was a guardrail notice with no song lyrics in it, right?
MR. GOULD: Object to form; foundation.
A So again, with the caveat that I haven't seen this document before, I'll take you at your word for what it is and the information available within the -- the metadata associated with this piece of output, yes, it does appear to be a prompt in the form of what we at BCGuardian submitted. And the completion does not appear to include lyrics to this song. I'm guessing it might be "Anti-Hero" by Taylor Swift, in which case I don't believe that the lyrics are reproduced here.
Q Okay. And my question to you is: Why was

196

this prompt and output not included in your declaration where you had in paragraph 10 the example from "All Along the Watchtower" where you said you ran into the guardrails but it nevertheless produced the -- the copyrighted -- or produced the lyrics to the composition? Why didn't you include the prompts and outputs in which you ran into the guardrail and there was no lyrics produced?
MR. GOULD: Objection to form; entire line of questioning based on a document he's never seen before and a prompt he didn't enter.
MS. MEHTA: Counsel, these are clearly speaking objections and they're clearly intended to coach the witness. Cut it out. You know that's improper. Limit your objection to the basis for stating the objections.
Q Mr. Candore, why didn't you include in your declaration to the Court the examples of instances in which you ran that same prompt format and ran into the copyright guardrails and did not receive any lyrics to the requested song?
A As I testified a few times here, the -- the information included within the declarations we provided was selected by counsel. We worked with counsel in drafting these declarations and ensuring

241

works.
MR. GOULD: Just see if the witness needs a break and -- or if the court reporter needs a break. We've been going for an hour and 17 minutes. They are the two stars here. It's not an endurance contest.
MS. MEHTA: You -- you good to go another five and then we'll wrap and go to the next thing?
THE WITNESS: Yeah. Good for five.
MR. GOULD: Karisa, you --
MS. MEHTA: Great.
THE REPORTER: It's okay.
MS. MEHTA: So Tab 5, please.
REMOTE TECHNICIAN: Absolutely. Stand by.
MS. MEHTA: Thank you.
(Exhibit 6 marked for identification.)
Q Let me know when you have that, Mr. Candore.
REMOTE TECHNICIAN: It is in Chat.
A Downloading.
MS. MEHTA: And Maddie, while he's doing that, I will go ahead and tell you the tab -- the next exhibit will be Tab 30, Exhibit 7.
A I have this up in front of me.
Q Great. So looking at Exhibit 6, Mr. Candore, is this -- this is a DuckDuckGo AI chat.

242

Do you see that?
A I do, yes.
Q Is this -- is this the DuckDuckGo testing that you were doing in November and December of 2024?
A This appears consistent with what we were doing during that period, yes.
Q Okay. Do you have any memory of this particular prompt, "create a greeting card inspired by"?
A I do recall a greeting card prompt, yes.
Q Okay. And how often in response to the greeting card prompts did you receive song lyrics to the song that was referenced or to a song by the referenced artist?
A Depends on the channel, on the platform we were using.
Q Why don't we start with DuckDuckGo.
MR. GOULD: You may answer whether you know.
A Yeah. I mean, look, I do not know as I sit here today in a way that I would be able to provide you hard numbers. I can tell you, generally, yes, lyrics were provided in response to greeting card prompts.
Q What's your approximation as to how often

243

that happened?
A Maybe 20 to 40 percent of the time.
Q If the jury and the judge in the case wanted to know whether the lyrics that were provided in response to greeting card prompts actually matched the lyrics of the song or were close to the lyrics of the song or were things that looked like lyrics or weren't actually from that artist, do you have a way to differentiate between the specific outputs that you got in response to the greeting card prompts?
MR. GOULD: Objection, form; and foundation.
If you can answer, you may.
A Sorry, do you mind repeating the question?
Q Yeah. In response to the greeting card prompts, you got different responses from these different AI agents, right?
A From the different third-party platforms, yes. Each time, obviously, yes, different responses.
Q Right. So let's look at this one, this first one. It says "Create a greeting card inspired by Mark Ronson."
Do you see that?
A I do.

244

Q And then it says, "Here is a greeting card inspired by the music and style of producer Mark Ronson."
Do you see that?
A Yes.
Q And then it says, "Hey there, you funky soul! You wanted to send" -- "Just wanted to send you a little groove to brighten up your day. I hope you're feeling the vibe and keeping the retro style alive!"
Do you see that?
A Yes.
Q Those aren't the songs to any -- those aren't the lyrics to any song by Mark Ronson, are they?
A No, it's not.
Q How many times when you were doing your searching using the greeting card prompts, did you get a response like this, where there was something that looked like a song or looked like lyrics but actually are not the lyrics to any song?
A I --
MR. GOULD: You may answer whether you know.
A I don't know the answer to that.
Q Approximation, more than 50 percent of the

245

time?
MR. GOULD: Objection to form; calls for speculation.
A Yeah. Truthfully, I -- it would be a little bit more than an educated guess if I were to speculate as to the range for how often we received nonlyrical content. I think that if you look at each conversation, right, the -- the back-and-forth between the -- the bot and we, the user, I would say in that range, if you look at it conversation by conversation, we obtained lyrics probably 20 to 40 percent of the time. But looking at this on a prompt-by-prompt basis, I -- I don't know because I don't know across this set how many prompts were issued for each conversation.
Q How many of the prompts that you did in November and December 2024, were greeting card prompts? I guess, aside from Lex which I know is a little bit different.
A Many, most probably.
Q And then, if I could have you turn --
A Sorry, just to clarify. That was a starting point. That was the starting point. And so, subsequent prompts may or may not still be focused on the greeting card.

246

Q Got it. Let me then just ask the clarifying question to make sure we have a clear record.
How many -- is it -- is fair to say that the testing you did in November and December of 2024, the majority of the initiating prompt, the first prompt in the conversation were requests for greeting cards?
A Yes. That's fair.
Q Okay. If I could just have you quickly turn to the next exhibit, Exhibit 7.
(Exhibit 7 marked for identification.)
A Zoom in on this one.
Q Yeah. It's a little small.
This is a prompt that says on the top left "Prepare a greeting card inspired by Ariana Grande," and then it has "Poe" next to it.
Do you see that?
A Yes, I do.
Q Okay. It says, "Prepare a greeting card inspired by Ariana Grande," and it says "Claude-3.5-Sonnet," and then "Poe" in little letters next to that.
Do you see that?
A Yes, I do.
Q Okay. And then there's a bunch of text

247

after that. And then if you look at the actual greeting card which appears on the bottom of the first page, it says "Thank you, next level of amazing. You're brighter than the moonlight, sweeter than any sweetener. Wishing you positions of joy and success."
Do you see that?
A I do.
Q And you understand none of those are lyrics to the -- to any Ariana Grande song, right?
MR. GOULD: Objection, form; foundation.
A I don't. I know "Thank You, Next" is an Ariana Grande song, but I don't know the lyrics to that one.
Q Okay. And in terms of this particular prompt, "prepare a greeting card inspired by Ariana Grande," do you know what Claude would have generated if you had made that prompt in the Web Console of Claude?
MR. GOULD: Objection, form; foundation.
A No, I don't.
Q Do you know what Claude would have generated if you had done that through the API?
MR. GOULD: Same objection.
A No, I don't.

248

Q Do you know how -- if Claude Web Console can generate greeting cards at all?
A That's what I was thinking about. I don't. I don't know if I've ever interacted with Claude's console in a way to generate anything with HTML.
Q Okay. And what about that APIs, can the APIs, the Claude APIs, generate greeting cards?
MR. GOULD: Objection, foundation.
A Well, the API wouldn't generate a greeting card. It would likely -- if -- if it could, it would likely generate the HTML code, like what you see here in the body of this -- this large block here on the page, and then you'd be able to take that and render it into whatever it is that the model had generated. But not having tested that, I don't know.
Q Okay. And last question on this is: Do you know the extent to which users of Claude or any of the access mechanisms you used, Poe or DuckDuckGo or Perplexity or Lex or Brace, APIs, Web Console, any of that, do you know the extent to which users use those tools for greeting cards inspired by performing artist or -- or songwriters?
MR. GOULD: Form.
A Goes right back to the earlier questions of

249

whether or not we've conducted any analyses to understand how users are using AI-enabled search engines to search for song lyrics, which is very specific. And no, we don't have any data on that. Just the same, no, we don't have any data on who uses AI to generate greeting cards, though I can tell you that there are services like one of those that we tested in this initiative which uses AI to generate images and cards and, you know, all -- all types of graphics for use on social media, etcetera. And so yeah, I think that it is a non zero number but, no, I don't have any data that shows how many users use Claude for greeting cards.

MS. MEHTA: Okay. Let's take a break.

THE VIDEOGRAPHER: The time is 3:17 p.m. We are going off the record.

(Whereupon a break was had.)

THE VIDEOGRAPHER: The time is 3:31 p.m. We are back on the record.

BY MS. MEHTA:

Q Mr. Candore, did you talk to your lawyer about the substance of your testimony during the break?

A No, I did not.

Q With respect to the testing prompts and

250

outputs that you've done, we've talked about three different points in time in which you did that, the last one being the November/December 2024 time frame.

Has BCG or BCGuardians done any additional work on this initiative since the November/December 2024 testing?

A I do not believe so.

Q No additional prompt and output testing that you're aware of?

A Not that I'm aware of, no.

Q And was there anyone else at BCGuardians that could be doing that besides you at this point?

A Highly unlikely.

MS. MEHTA: We're going to pull up another declaration -- I'm sorry, another exhibit, I apologize.

If we could, please pull up Tab 26 and mark that as the next exhibit.

REMOTE TECHNICIAN: Stand by.

MS. MEHTA: Thank you.

(Exhibit 8 marked for identification.)

REMOTE TECHNICIAN: It's available in Chat.

Q Great, if you could, Mr. Candore, pull up, if you would, Exhibit 8 and let me know if you have

251

that handy.

A Okay. I have it.

Q Great. So if you look at Exhibit 8, you will see there a cover sheet and that, again, has the date October 13, 2023.

Do you see that?

A I do.

Q And that was before both of the declarations that were submitted, the Seymour declaration and your declaration, correct?

A Yes.

Q Okay. And you see on the front page there it says, "Name: Michael Candore."

Do you see that?

A I do.

Q And an "E-Mail Address_CF," it has m.candor@bcguardian.com.

Do you see that?

A I see that, yes.

Q And that's your e-mail address, correct?

A Yes.

Q Okay. If you look at the prompt, it says -- this is on page 2, "Human: Give me the chords together with the lyrics to shiver by Coldplay."

Do you see that?

252

A I do, yes.

Q Now, that's a prompt format that you didn't identify in either the Seymour declaration or in your declaration, correct?

A Yes. I don't believe we used this format in that declaration, correct.

Q How many prompts did you enter into Claude for chords and lyrics for particular songs?

MR. GOULD: You may answer if you know whether you know.

A I don't know the answer to that.

Q How many -- were there instances in which you asked for chords together with lyrics and did not receive lyrics?

A I don't recall.

Q Did you enter into a prompt into Claude for chords and lyrics and only receive chords?

A I don't recall.

Q Did you ever enter a prompt into Claude for chords together with lyrics or chords and lyrics and only receive lyrics?

A I don't recall.

Q Do you know what the reproduction rate was, again, to use your terminology, for prompts into Claude with the language "chords together with

273

just hit him in the face now. I beg to differ on that one.

Q Sir, you understand that the publishers in this case are asserting an allegation of willful infringement, right?

MR. GOULD: Objection, form; foundation.

A Not -- not an attorney. You -- I mean, if you'd like to elaborate, I'm happy to hear you out on that one, but no.

Q I'll represent to you that the publishers are arguing that Anthropic is willfully infringing their copyrights. Okay?

A Okay.

Q In assessing whether or not Anthropic is willfully infringing their copyrights, it might be reasonable for a jury to evaluate how often lyrics are output and how often prompts, including the ones that you claim led to this pervasive infringement, actually didn't generate any lyrics at all.

You'd agree with that, right?

MR. GOULD: Objection, argumentative; form. These are arguments for the judge, not for Mr. Candore.

You may answer --

Q Mr. Candore, you can answer the question.

274

MS. MEHTA: Stop the speaking objections, Mr. Gould.

A If I --

MR. GOULD: You can ask questions that are appropriate questions for a deposition about this fact witness' knowledge, it will be a lot smoother for both of us.

MS. MEHTA: I'm -- I'm perfectly capable of deciding what questions I want to ask. I'm going to ask the questions I'm asking. You have to limit your objections to stating the basis of your objections. You're behaving completely inappropriately.

Q Mr. Candore, you understand --

MR. GOULD: Form.

Q I have represented to you, sir, that the publishers are arguing that the infringement is willful.

Would you agree that it would be relevant or at least reasonable for the jury to understand how many instances in which you made these prompts and you got no lyrics at all?

MR. GOULD: Same objections; badgering the witness.

A If I'm a member of the jury, perhaps that is

275

something which holds sway. Or I may be a member of the jury who says, well, the absolute figures are enough. This gets back, again, to the issue of the numerator and the denominator in our calculus. And if we're dealing with absolute figures and what Plaintiffs put forward is to show that hundreds upon hundreds of works were reproduced by Anthropic's models, maybe I'm that member of the jury who says that's enough.

I think it is reasonable to assume that there may also be a member of the jury who says, well, I would like to know what that infringement rate is or what that calculus is.

So I think that's as direct -- actually, I feel like that's very indirect. That's the best I think I can answer your question.

My personal capacity as I sit here today, reasonable in some situations maybe for some jurists, maybe not for others, maybe not relevant for others at all.

MS. MEHTA: Could I have marked as exhibit -- as the next exhibit, I guess, Exhibit 14, Tab 15?

REMOTE TECHNICIAN: Stand by.

MR. GOULD: Sorry, which are we on now, 13?

276

MS. MEHTA: No. There's a new exhibit coming, Exhibit 14.

REMOTE TECHNICIAN: Sorry, you said Tab 15? That's the previous exhibit number, unless I got confused. I have Exhibit 13 as Tab 15, which is what you said.

MS. MEHTA: You're right. We do have that. Let's look at Exhibit 13. I apologize.

MR. GOULD: Did we pull that up already?

MS. MEHTA: It's in the chat, I just don't think we've looked at it yet.

A I have it in front of me now.

Q You have in front of you Exhibit 13, correct?

A Yes, I do.

Q Okay. And this particular prompt, again, has a date of October 4th, 2023, right?

A Okay. Yes.

Q Do you see that on the front page?

A Sorry, yes, it does. I see that, yes.

Q And then it has the name Michael Candore? You see that?

A Yes.

Q And it has your e-mail address, right?

A Yes.

277

Q Okay. And is there any reason sitting here today under oath that you would identify for -- as a basis to say this did not come from you or from BCGuardians?
MR. GOULD: Objection, form; foundation, speculation.
A Same -- same response as with the last two or three of these we've looked at. The prompting style generally tracks with what we were doing. The time period generally tracks. The name and e-mail address are there. It's not my document, but I don't have a reason to say that this is not related to the work that we were doing.
Q Okay. If you could go to prompt number -- the second page to the prompt. It says, "what are the lyrics to are we really doing your will? by the winans."
Do you understand that?
A I do.
Q And that generally tracks that generally 7 paragraph format we were talking about, "what are the lyrics to" --
A Yes.
Q -- "[composition title] by [performing artist]," right?

278

A Yes.
Q And the response here is, Unfortunately, I do not have access to full song lyrics, but here is a summary of the lyrics to we are really doing your will by the Winans.
Do you see that?
A Yes.
Q And then, if you look below that the summary, you see what describes a summary of the song but not the full lyrics to the song, right?
A Yes.
Q How many times did you prompt Claude with that paragraph 7 prompt format and receive a response that said: Unfortunately, I do not have access to full song lyrics but here's a summary of the lyrics?
MR. GOULD: You may answer whether you know.
A I don't have a hard number for that. I don't know.
Q It happened more than once?
MR. GOULD: Same objection.
A I believe so, yes.
Q Do you have any information as to -- sorry. Let me ask the question this way.
This prompt and output was generated prior

279

to the declarations that were submitted to the Court, correct?
A This -- based on the timestamp included in the document which you're representing is related to our prompt is October 4th of '23, which does predate the Seymour declaration of November 16th of '23, so yes.
Q And you are -- well, and to be clear, I'm not representing that it's your prompt. I'm representing that it was in a sample with your name and your e-mail address. And you said you don't have a basis to believe that it's not your prompt sitting here today.
With respect to this particular prompt, this -- this example where you gave the paragraph 7 prompt and then the output said, "Unfortunately, I do not have access to full song lyrics," that is not something that was -- those examples of prompts and outputs were not submitted to the Court, correct?
MR. GOULD: Objection, form; foundation; calls for speculation.
A I don't believe so, no.
Q And do you have any nonprivileged explanation for why when you submitted the prompts and outputs with that format you omitted the ones

280

that said, "Unfortunately, I do not have access to full song lyrics"?
A Same response I've given for the last few of these. No, I don't have a nonprivileged response as to why this may not have been included within the declaration.
Q Oppenheim + Zebrak made that decision, correct?
A That's correct.
MS. MEHTA: Let's go to the next exhibit, which will be Exhibit 14 this time, and this is Tab 20.
REMOTE TECHNICIAN: Stand by.
(Exhibit 14 marked for identification.)
REMOTE TECHNICIAN: It's in the Chat.
Q Great. Why don't you go ahead and pull that up, sir.
A Okay.
Q This is a prompt that is -- it says "Songwriting Dare You to Move - Claude."
Do you see that?
A I do, yes.
Q Okay. And it is a prompt that says, "lets create a song like DARE YOU TO MOVE (I DARE YOU TO MOVE) by switchfoot."

325

the system works. They're going to be the one that get to determine.

MS. MEHTA: Nothing further from me.

MR. GOULD: Nor I. I think we already designated the record and we'll review and sign.

Nice to meet you, Sonal. Thank you all for your contributions today.

MS. MEHTA: Yes. Thank you so much both. And we'll say our goodbyes in just a second after we go off the record. Appreciate your time.

THE VIDEOGRAPHER: All right. That marks the end of the deposition.

The time is 5:16 p.m.

(Whereupon the proceedings were concluded at 5:16 p.m. CST.)

326

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 8th day of November, 2025.

Karisa Ekenseair, CCR RPR RMR RDR
CA CCR #14546

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ACKNOWLEDGMENT OF DEPONENT

I, Michael Candore, 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.

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