EXHIBIT 110

(FILED UNDER SEAL)

1

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION
- - - - - - - - - - - - x
CONCORD MUSIC GROUP, INC., et al., : Plaintiffs, : Case No. 5:24-cv-03811-EKL
v. :
ANTHROPIC PBC, : Defendant. :
- - - - - - - - - - - - x

Videotaped Deposition of
ABKCO MUSIC & RECORDS, INC.
By and Through Its Designated Representative
ALISA COLEMAN
In Her Corporate and Individual Capacity
New York, New York
Wednesday, October 29, 2025
9:10 A.M.

HIGHLY CONFIDENTIAL
ATTORNEYS' EYES ONLY

Pages: 1 - 239
Reported By: Anita M. Trombetta, RMR, CRR,
California CSR No. 14647

2

Videotaped deposition of ABKCO MUSIC & RECORDS, INC., by and through its designated representative, ALISA COLEMAN, in her corporate and individual capacity, held at the offices of:

Wilmer Cutler Pickering Hale & Dorr LLP
7 World Trade Center
250 Greenwich Street
45th Floor
New York, NY 10007
212.230.8800

Pursuant to notice, before Anita M. Trombetta, a Certified Shorthand Reporter in the State of California, RMR, CRR, and Notary Public in and for the State of New York.

3

APPEARANCES

ON BEHALF OF THE PLAINTIFFS AND THE WITNESS:
ALEX KAPLAN, ESQ.
OPPENHEIM + ZEBRAK, LLP
461 5th Avenue
19th Floor
New York, New York 10017
212.951.1105

ON BEHALF OF THE DEFENDANT:
LOUIS W. TOMPROS, ESQ.
DISHA PATEL, ESQ. (Via Zoom)
WILMER CUTLER PICKERING HALE & DORR LLP
60 State Street
Boston, Massachusetts 02109
617.526.6886

ALSO PRESENT:

IAN CHEN, ESQ., ANTHROPIC (via Zoom)
ENRIQUE CASAS, Videographer

4

----------I N D E X----------
WITNESS - ALISA COLEMAN

EXAMINATION BY	Page
ATTORNEY TOMPROS	11
ATTORNEY KAPLAN	219
ATTORNEY TOMPROS	219

----------E X H I B I T S----------

Exhibit	Description	Page
Exhibit 1	Defendant Anthropic PBC's Notice of Deposition to ABKCO Music, Inc., Pursuant to Federal Rule of Civil Procedure 30(b)(6)	13
Exhibit 2	Defendant Anthropic PBC's Notice of Deposition to Alisa Coleman Pursuant to Federal Rule of Civil Procedure 30(b)(1)	20
Exhibit 3	List of Comps, ABKCO_0000000617.xlsx	23
Exhibit 4	Declaration of Alisa Coleman in Support of Plaintiffs' Motion for Preliminary Injunction	32

9

EXHIBITS CONTINUED

Exhibit 40	Plaintiffs' Supplemental Objections and Responses to Defendant's Second Set of Interrogatories 3 to 4	214
Exhibit 41	Coleman LinkedIn Printout	228
Exhibit 42	Jacqbot Chat App Page, 10/28/2025, 6:04 P.M.	235

----------INSTRUCTION NOT TO ANSWER----------

Page 206

10

PROCEEDINGS

THE VIDEOGRAPHER: Here begins media number 1 in the videotaped deposition of Alisa Coleman, in the matter of Concord Music Group vs. Anthropic, in the United States District Court, Northern District of California, San Jose Division, Case Number 5:24-cv-03811-EKL.

Today's date is October 29th, 2025, and the time on the video monitor is 9:10 A.M. The videographer today is Enrique Casas, representing Planet Depos. This video deposition is taking place at 250 Greenwich Street, New York, New York.

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

ATTORNEY TOMPROS: Good morning. This is Louis Tompros of Wilmer Cutler Pickering Hale & Dorr on behalf of defendant Anthropic PBC. And also joining by Zoom is my colleague also from Wilmer Cutler Pickering Hale & Dorr, Disha Patel, as well as Ian Chen from Anthropic.

ATTORNEY KAPLAN: And this is Alex Kaplan of Oppenheim + Zebrak, representing the plaintiffs in this case and the witness today.

THE VIDEOGRAPHER: The court reporter today is Anita Trombetta, representing Planet Depos.

The witness will now be sworn in.

ALISA COLEMAN, called as a witness, having been first duly sworn by a Notary Public, was examined and testified as follows:

EXAMINATION BY
ATTORNEY TOMPROS:

Q Good morning, Ms. Coleman.

A Good morning.

Q Can you please state your full name and business address for the record, please.

A My full name is Alisa Coleman. My business address is ABKCO Music & Records, Inc. at 85 Fifth Avenue, 11th floor, New York, New York 10003.

Q Have you given testimony at a deposition before?

A Yes.

Q How many times?

A Three.

Q And when was that?

A Prior to 2020.

Q And what were the nature of the cases in which you have been deposed before?

A Copyright infringement.

12

Q And what were those cases?

A One was Coley McCabe and Slobes (phonetic) -- I don't remember -- versus ABKCO. The one -- the most recent one was Wolfgang's Vault versus a host of music publishers. I don't remember the one in between, but there was one more.

Q Okay. Have you ever given testimony in a court before?

A Yes.

Q When was that?

A In 2020 for Wolfgang's Vault.

Q And where was that case --

A New York.

Q And that was a copyright infringement case?

A Yes.

Q Other than that case, have you given testimony in court before?

A No.

Q Now, you understand you've taken an oath to tell the truth today, right?

A Yes.

Q The same oath that you would take in court, right?

A Yes.

49

[redacted]

Q ABKCO -- strike that.
ABKCO's copyrights for the ABKCO works are to the musical work as a whole, correct?
ATTORNEY KAPLAN: Form objection and scope.
A Define musical --
Q Yeah, that was not a great question.
Does ABKCO's -- does ABKCO -- strike that.
ABKCO's copyrights in the compositions are to the music and lyrics, right?
A Correct.

50

Q ABKCO does not have separate copyrights to the lyrics for any of the songs identified in the ABKCO song list, right?
ATTORNEY KAPLAN: Form objection and scope.
A Correct.
Q ABKCO has an extensive catalog of musical compositions, right?
A Yes.
Q What does a catalog mean in your business?
A A catalog is a grouping of songs by the same writers or artists.
[redacted]
Q And over the years, ABKCO has acquired catalogs from other publishers, correct?
ATTORNEY KAPLAN: Form objection.
A Define "acquired."
Q Sure.
Are there catalogs that used to be owned by other publishers that are now owned by ABKCO?
A Yes.
Q And how did that come about?
ATTORNEY KAPLAN: Form objection and scope.

51

A It -- it -- you need to be more specific because it depends upon each specific catalog.
Q Are there instances in which another publisher has sold its catalog to ABKCO?
ATTORNEY KAPLAN: Form objection and scope.
A No.
Q Are there instances in which ABKCO has acquired another publishing company?
ATTORNEY KAPLAN: Same objection.
A Yes.
[redacted]
(Reporter clarification.)

52

[redacted]

77

Q So the portion of the chorus that we listened to in the MP3 that you thought said, "I can change" is the same as what is shown here as, "I can change" on genius.com, right?
ATTORNEY KAPLAN: Form objection.
A This -- this is unusual because Genius is clearly relaying these lyrics to this live performance, but -- and I have never seen this before, but these lyrics may be related to these videos or whatever that are attached to this. And so without seeing the videos that are attached, I think it's not accurate to review the lyrics.
Q Okay. But you'll agree with me that the text shown under the videos on genius.com says, "I can change," correct?
A That is what it says.
Q And the text shown in the sheet music produced by ABKCO says, "I can't change," right?
ATTORNEY KAPLAN: Form objection.
A Yes. I --
Q And -- I'm sorry. Go ahead.
A No.
Q And then when you listened to the MP3 deposit copy, you heard, "I can change," right?
ATTORNEY KAPLAN: Form objection.

78

A I'd have to listen again.
Q You're welcome to listen again if you'd like. Go ahead and return to --
[redacted]
Q Okay. What is Musixmatch, M-U-S-I-X-M-A-T-C-H?
A A lyric aggregator.
Q And does ABKCO have a license with Musixmatch?
A Yes.
(Coleman Exhibit 13, marked for identification.)
Q I've now marked as Exhibit 13, a multi-page document beginning with the control number ABKCO ending 045, going through 051.
Do you have that in front of you?
A I do.
Q This is ABKCO's license agreement with Musixmatch, right?
A Yes.
Q Are the lyrics that Musixmatch displays on

79

its website accurate?
ATTORNEY KAPLAN: Form objection.
A It's very broad to say that. I don't know for every single song.
Q Are they -- are the lyrics that Musixmatch displays of the ABKCO works accurate?
A Again, it's broad.
ATTORNEY KAPLAN: Same objection.
Q Are the lyrics that Musixmatch displays for the 25 asserted ABKCO works accurate?
ATTORNEY KAPLAN: Same objection.
[redacted]

80

[redacted]
(Coleman Exhibit 14, marked for identification.)
Q Ms. Coleman, you have now been handed what has been marked as Coleman Exhibit 14, a four-page document with the header "Bitter Sweet Symphony." And under that, it says,

81

"musixmatch.com/lyrics/the-verve/bitter-sweet-symphony."
A Yes.
Q And this is the lyrics of "Bitter Sweet Symphony" as they appear on Musixmatch, right?
ATTORNEY KAPLAN: Form objection.
A So you say.
Q And at page 2 of Exhibit 14, under the chorus, it says, "I can change, I can change, I can change," right?
A Correct.
Q And again, that is consistent with what you heard on the MP3 but inconsistent with the sheet music Exhibit 10, right?
ATTORNEY KAPLAN: Form objection.
A Both are correct. Both are authorized by ABKCO. Both -- both can be true.
Q So the lyrics of a song can be both, "I can change" and "I can't change," right?
A However we've authorized it.
Q Okay. Which one did the songwriter write?
ATTORNEY KAPLAN: Form objection. Foundation.
A The MP3 accurately represents what was submitted to the copyright office that the

82

songwriter wrote.
Q And so to know what the genuine and accurate lyrics are, you have to look to the deposit copy, right?
ATTORNEY KAPLAN: Form objection. Calls for a legal conclusion.
A The commercial -- the commercially released version was submitted to the copyright office, and that is the original version. It is not the only; it's the original.
Q And to make sure I have this right, ABKCO claims copyright rights in a version of "Bitter Sweet Symphony" that includes the lyrics, "I can change, I can change," right?
ATTORNEY KAPLAN: Form objection.
A Yes.
Q ABKCO claims copyright rights in a version of "Bitter Sweet Symphony" that includes the lyrics, "I can't change, I can't change," right?
ATTORNEY KAPLAN: Same objection.
A Yes.
Q And are -- are ABKCO's copyright rights to both of those versions registered?
ATTORNEY KAPLAN: Form objection.
A In different ways. This sheet music would

83

have been registered with the copyright office as an ISBN number, not as a copyright office-- not as a copyright certificate. So both would have been protected by copyright.
Q We've been talking about the song "Bitter Sweet Symphony" so far, right? A lot, yes?
A Yes.
Q How many words are in the title of the song, "Bitter Sweet Symphony"?
ATTORNEY KAPLAN: Form objection.
A Two or three.
Q Is it two or is it three?
ATTORNEY KAPLAN: Form objection.
A It can be either.
Q Which one is registered?
ATTORNEY KAPLAN: Form objection.
A I have to look at the certificate.
Q Let's go ahead and take a look at the certificate of registration, which is attached to your --
A Which one?
Q Exhibit -- I believe it's Exhibit 8.
A This pile. No, that's 11. Hold on. Ten. I'm trying to keep these in order, sorry. Eight. Okay.

84

Q And how many words --
A It has three words.
Q So the title of "Bitter Sweet Symphony" as registered is "Bitter," space, "Sweet," space, "Symphony," right?
And that's the certificate of registration that you yourself submitted, correct?
A Correct.
Q Let's look at the ABKCO works in suit song list, Exhibit 3.
According to the ABKCO works in suit song list, how many words are in the title of "Bittersweet Symphony"?
ATTORNEY KAPLAN: Objection to form.
A Two.
Q So is that wrong?
ATTORNEY KAPLAN: Objection to form.
A No. It's an alternate version title.
Q Is that alternate title registered?
ATTORNEY KAPLAN: Objection to form.
A Yes. Because the -- because the sheet music that's copyrighted at the copyright office under the ISBN has two words.
Q And do you have a certificate of registration for the sheet music?

93

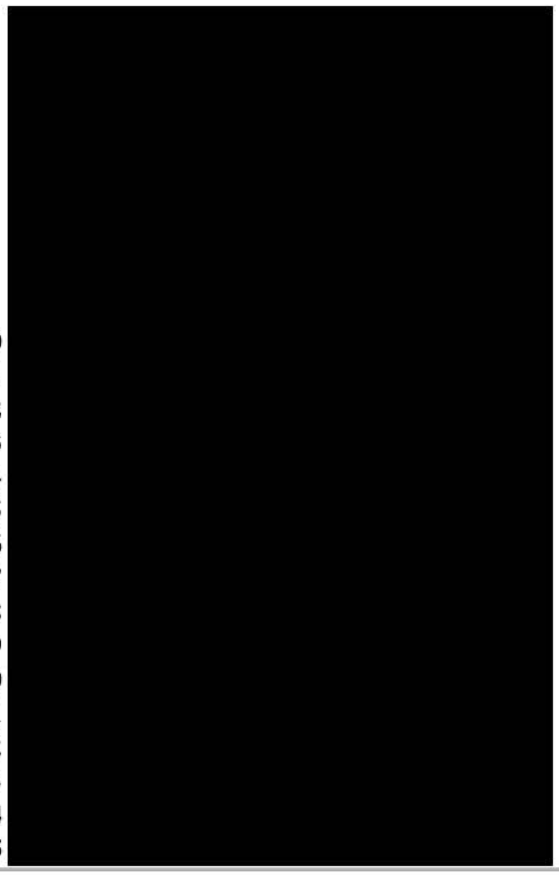
LyricFind.
Q I see.
So if we return to Exhibit 17, the lyrics that ABKCO --
A Hold on. 17.
Yes?

94

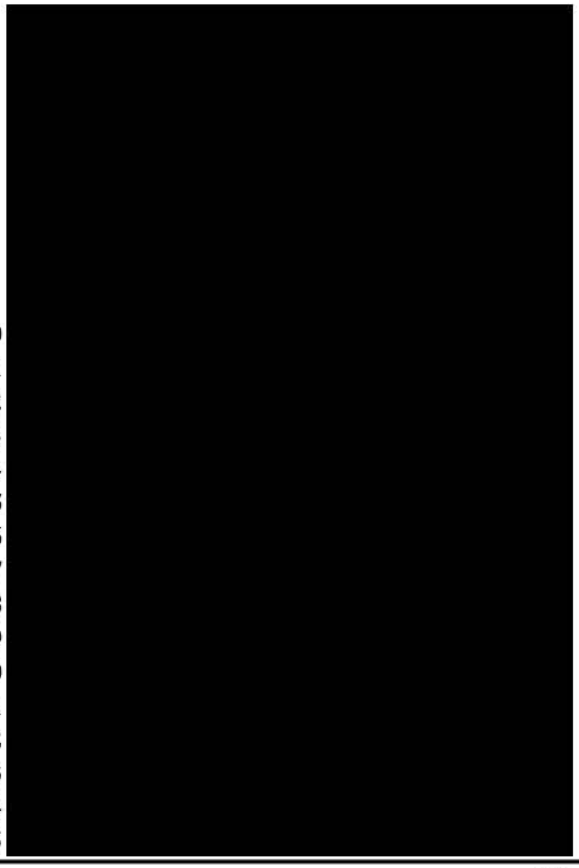
95

96

97



98



99



Q Okay. Let's take a look at another exhibit.

(Coleman Exhibit 18, marked for identification.)

A You're going to go through the whole box, right?

Q We might.

A Okay.

Q Ms. Coleman, you have been handed what has been marked Coleman Exhibit 18. It is a multi-page document beginning with the control number ABKCO_ending 872 through 873, right?

100

A Correct.

Q It is a two-page document, yes?

A Yes.

Q Okay. What is Exhibit 18?

ATTORNEY KAPLAN: Form objection.

A It's guitar tablature for the song, "Dead Flowers."

Q This is tablature, in your understanding?

A It's the top line tablature from the guitar tablature book that we created.

Q Okay. "Dead Flowers" is one of the ABKCO-asserted works, correct?

A Correct.

Q Are the lyrics in this document, Exhibit 18, accurate?

ATTORNEY KAPLAN: Form objection.

A As they were transcribed by the person creating the tablature.

Q So I don't quite follow. Are they -- sorry.

Are the lyrics in Exhibit 18 genuine ABKCO lyrics?

ATTORNEY KAPLAN: Form objection.

A Yes --

THE WITNESS: I'm sorry. Go ahead.

117

complete copy of what's on their website. I know it's the first four pages that you supplied me with, but, you know --

Q Fair enough.

A -- you supplied it, so I don't know if the -- if there is -- you know, from these four pages, there -- from what you've shown me.

Q Okay. So from what Exhibit 14 reflects, the name ABKCO doesn't appear, right?

A Correct.

Q So there is no way to remove the name ABKCO from Exhibit 14, right?

ATTORNEY KAPLAN: Form objection.

A Correct.

Q So -- and from what Exhibit 14 reflects, there is no copyright notice, right?

ATTORNEY KAPLAN: Form objection.

A Correct.

Q And so there is no way to remove a copyright notice, right?

ATTORNEY KAPLAN: Form objection.

A Correct.

Q Now, you are aware that the defendant in this case is Anthropic, right?

A Yes.

118

Q And there are allegations that Anthropic copied the lyrics of the 25 asserted ABKCO works, right?

A Yes.

Q Are you aware of any instance -- strike that.

Is there any instance -- I'm going to go back to the way I had it before.

Are you aware of any instance in which Anthropic copied the musical notation of any ABKCO work?

ATTORNEY KAPLAN: Form objection.

A I am not.

Q Okay. And are you aware of any instance in which Anthropic -- strike that.

I apologize if this is repetitive. I can't remember if I asked the question in this way, so I'm going to ask it -- not trying to get a different answer, just trying to make sure I've got it.

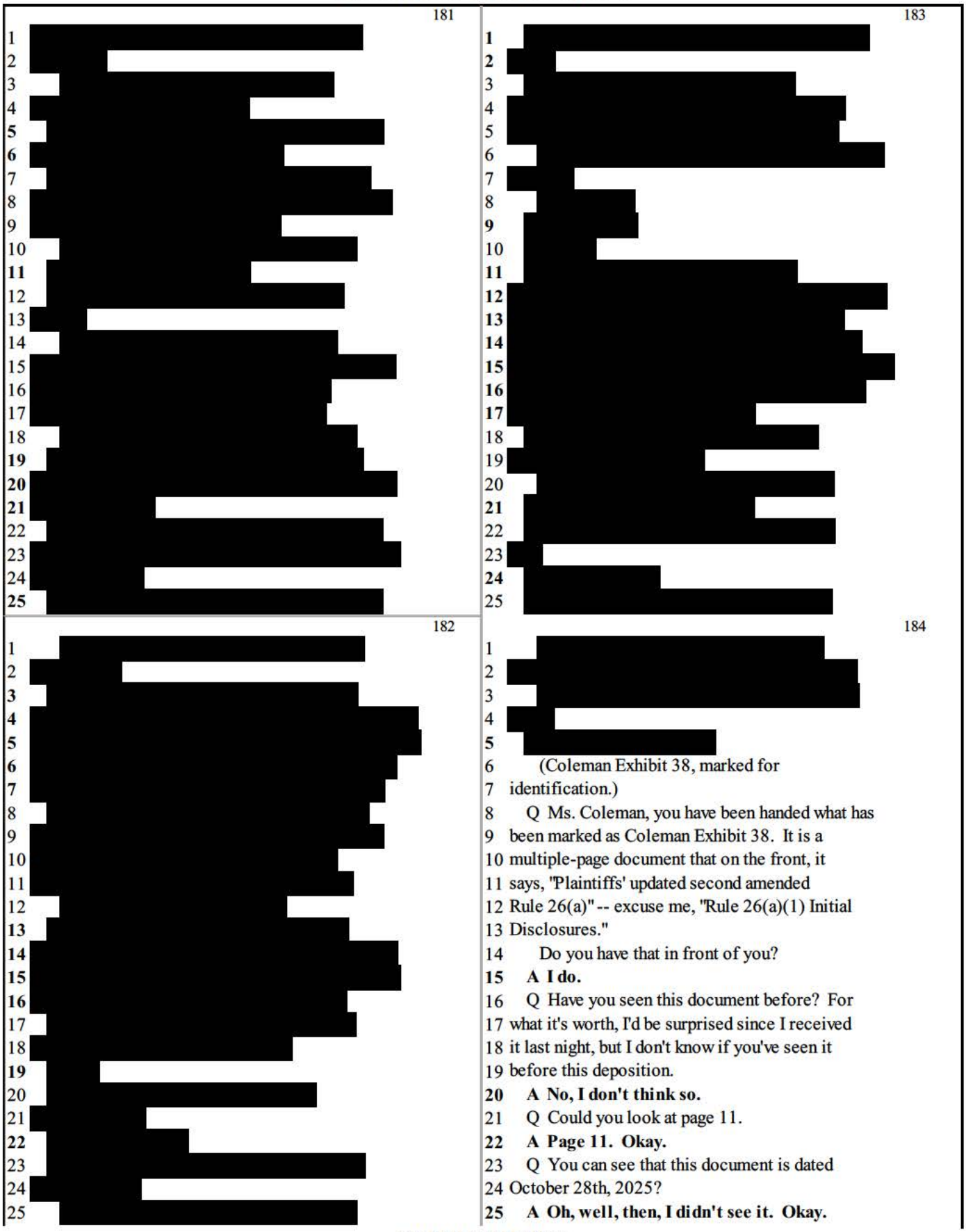
[redacted]

119

[redacted]

120

[redacted]



181

182

183

184

(Coleman Exhibit 38, marked for identification.)

Q Ms. Coleman, you have been handed what has been marked as Coleman Exhibit 38. It is a multiple-page document that on the front, it says, "Plaintiffs' updated second amended Rule 26(a)" -- excuse me, "Rule 26(a)(1) Initial Disclosures."

Do you have that in front of you?

A I do.

Q Have you seen this document before? For what it's worth, I'd be surprised since I received it last night, but I don't know if you've seen it before this deposition.

A No, I don't think so.

Q Could you look at page 11.

A Page 11. Okay.

Q You can see that this document is dated October 28th, 2025?

A Oh, well, then, I didn't see it. Okay.

217

It asks, "Identify the total number of times prior to the filing of your initial complaint in this action that you prompted Claude or Claude API by requesting lyrics to songs and did not receive an output containing the requested lyrics. 3,128."

Do you see that?

A Yes.

Q So there were instances even before this lawsuit in which publishers asked for lyrics from Claude and ultimately did not get the requested lyrics, right?

ATTORNEY KAPLAN: Objection to form and scope.

A Not my experience.

Q That was going to be my question.

Are there any instances in -- prior to the filing of this lawsuit, in which ABKCO requested lyrics from Claude to an ABKCO work and did not receive the lyrics?

A No.

Q Okay. Good.

But there are instances after implementation of the guardrails where ABKCO requested lyrics and did not receive the lyrics,

218

right?

A Yes.

Q Thank you. Just one minute here.

ATTORNEY TOMPROS: Okay. At this point I think I have concluded my questioning of the 30(b)(6) topics, though I would reserve our right and formally hold the deposition open because there were a number of topics for which the witness, in our view, was insufficiently prepared.

We'll review the transcript and follow up in writing after that. I suspect you disagree, but that is going to be our view, and we can deal with that in writing after the fact.

ATTORNEY KAPLAN: I mean, I do disagree, but can you just give me an instance where you thought she was not prepared on a topic here?

ATTORNEY TOMPROS: Sure.

So for example, the websites using lyrics, the -- the -- the financial information -- well, not financial information. Let me give you a -- the -- essentially the places where there were business affairs requests, where she said that business affairs was handling various things, that includes the websites' use of lyrics, the websites' use of implied licenses through things

219

like robots.txt, the licensing terms of certain agreements, the quantification of harm that ABKCO has suffered.

ATTORNEY KAPLAN: Okay. I mean, I certainly disagree. I'm not sure that all of those are even within the scope. And I'm not sure that there are answers to those questions. I don't think there was anything she couldn't answer on the websites using or displaying lyrics, but I -- I hear you and obviously we disagree.

I would like to ask a couple clarifying questions of the witness on the 30(b)(6).

ATTORNEY TOMPROS: Sure.

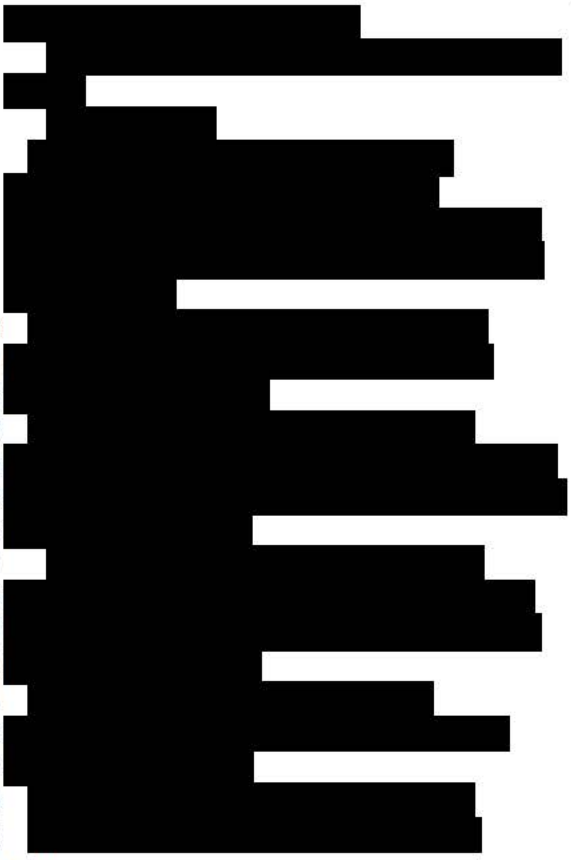
ATTORNEY KAPLAN: I feel like I should do that now.

ATTORNEY TOMPROS: That's absolutely fine.

EXAMINATION BY
ATTORNEY KAPLAN:



220



237

You were the president of a venture capital group, right?
A That's correct.
Q And it was called the Coleman Alliance?
A Yes.
ATTORNEY TOMPROS: I don't have any further questions.
ATTORNEY KAPLAN: I have no questions.
ATTORNEY TOMPROS: All right.
THE VIDEOGRAPHER: Stand by.
This marks the end of the deposition. We are going off the record. The time is 3:52 P.M.
(Time Noted: 3:52 P.M.)

238

ACKNOWLEDGMENT OF DEPONENT

I, Alisa Coleman, 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.

_____ _____
(SIGNATURE) (DATE)

239

CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

I, ANITA M. TROMBETTA, RMR, CRR, and Certified California Shorthand Reporter, 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 [or not requested, as appropriate]; 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 notarial seal this 2nd day of November, 2025.

My commission expires: 03.21.2027



ANITA M. TROMBETTA

No. 605670

Re: Deposition of Alisa Coleman, Designated Representative & Individually
Date: 10/29/2025
Case: Concord Music Group -v- Anthropic
Return to: transcripts@planetdepos.com

Page	Line	Correction/Change and Reason
12	2	Change "Coley McCabe Slobes (phonetic)" to "Scali, McCabe, Sloves"; Misspelling
67	23-24	Change "simpleized [sic]" to "simplified; Clarification
203	1	Change "I don't" to "I don't think"; Clarification

12/10/25
(Date)

(Signature)

No. 605670

Re: Deposition of **Alisa Coleman, Designated Representative & Individually**
Date: 10/29/2025
Case: Concord Music Group -v- Anthropic
Return to: transcripts@planetdepos.com

ACKNOWLEDGMENT OF DEPONENT

I, Alisa Coleman, Designated Representative & Individually, 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.

12/10/25 _____
(Date) (Signature)