EXHIBIT 115

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION
Case No.
5:24-cv-03811-EKL-SVK

CONCORD MUSIC GROUP, INC., et al.,
Plaintiffs
vs.
ANTHROPIC PBC,
Defendant

VIDEOTAPED DEPOSITION OF JOSHUA W. DENNIS
Monday, March 9, 2026 9:02 a.m.
WilmerHale
60 State Street, Boston, MA 02109

Reported by:
Janet McHugh, RMR, CRR, CLR
JOB NO. 621067

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March 9, 2026
9:02 a.m.

Videotaped deposition of JOSHUA W. DENNIS, held at the offices of WilmerHale, 60 State Street, Boston, Massachusetts, pursuant to Agreement, before Janet McHugh, a Registered Merit Reporter, Certified Realtime Reporter, Certified LiveNote Reporter, and a Notary Public within and for the Commonwealth of Massachusetts.

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APPEARANCES:

OPPENHEIM + ZEBRAK, LLP
(By Keith Howell, Esquire)
Wisconsin Avenue, NW, Suite 503
Washington, DC 20015
khhowell@oandzlaw.com
Counsel for the Plaintiffs

WILMER, CUTLER, PICKERING, HALE & DORR
(By Louis W. Tompros, Esquire, and
Disha Patel, Esquire) (via Zoom)
60 State Street
Boston, MA 02109
617.526.6000
louis.tompros@wilmerhale.com
disha.patel@wilmerhale.com
Counsel for the Defendant

ALSO PRESENT:
Karl Johnston, Anthropic (via Zoom)
Dimas Bardales, Videographer

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PROCEEDINGS

THE VIDEOGRAPHER: Here begins Media No. 1 in the videotaped deposition of Joshua Dennis in the matter of Concord Music Group, Inc. et al., versus 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 March 9, 2026. The time on the video monitor is 9:02. The videographer today is Isaac Weaver, representing Planet Depos, headquartered at 451 Hungerford Drive, Suite 400, Rockville, Maryland 20850.

This video deposition is taking place at 60 State Street, Boston, Massachusetts.

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

MR. TOMPROS: Good morning. This is Louis Tompros of Wilmer Cutler Pickering Hale and Dorr, LLP, along with my colleague Disha Patel, representing the defendant, Anthropic PBC.

MR. HOWELL: Good morning. My name is Keith Howell from Oppenheim + Zebrak on behalf of the music publisher plaintiffs.

THE VIDEOGRAPHER: The court reporter

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today is Janet McHugh, representing Planet Depos. The witness will now be sworn.

JOSHUA DENNIS,

having been duly sworn, after presenting identification in the form of a driver's license, deposes and says as follows:

DIRECT EXAMINATION

BY MR. TOMPROS:

Q. Good morning, Mr. Dennis.

A. Good morning.

Q. You have given testimony at depositions before, right?

A. I have.

Q. Roughly how many times?

A. For depositions, I believe twice.

Q. And you've given testimony at trial before as well, right?

A. I have.

Q. Roughly how many times?

A. Certainly one was a jury trial and then there were two others that were during the COVID era and were part of bankruptcy proceedings, so directly with the judge. So I'm not sure if that counts as trial or not. But they're on my CV.

Q. And you understand you've taken an oath

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Do you see that?
A. I do.
MR. HOWELL: Objection. Form.
Q. That statement was incorrect. Correct?
MR. HOWELL: Objection. Form.
A. No. It depends on -- as of the time I wrote it, it was my understanding in that -- my understanding of what I received that was not -- did not have a doc ID, if you will, between 1 and 5 million pertaining to the title records, that those title records were -- the records I received were intended to replace the title records as part of that 5 million sample.
Q. The 6,849 conversations that you received from the publishers' lawyers, not all of them were part of the 5 million sample, right?
MR. HOWELL: Objection to form. Vague.
A. At the time I wrote that, my understanding was that the title -- the documents -- certain documents were produced that were intended to replace and take the place of title records that were in the sample.
Q. They gave you some things that were not in the 5 million sample, correct?
MR. HOWELL: Objection. Form. Vague.

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Asked and answered.
A. As I stated, my understanding is that certain of the documents were intended to replace and take the place of things that were in the 5 million sample. So, therefore, they would be subsumed in that sample population. That was my understanding at the time.
Q. And you later changed your analysis by removing the files that Dr. Bray identified that were not part of the 5 million sample, right?
MR. HOWELL: Objection. Form. Vague.
A. I removed from my analysis a few different categories of things to comport with Dr. Bray's understanding, certainly one of which was documents that did not have a doc ID between -- I think it was 1 and 5 -- between 1 and 5 million.
Q. So did you actually check the content of any of the other of the 6,849 files to confirm that they were part of the 5 million?
MR. HOWELL: Objection. Form. Vague.
A. What do you mean by "content"?
Q. The actual text of the files.
MR. HOWELL: Objection. Form. Vague.
A. I'm unclear on whether the text of the file -- I'm not sure how the text of the file would tell me whether or not it was inherently in the sample.

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Q. You had access to the 5 million sample, right?
A. I did.
Q. Did you search it at any point?
A. Did I search it? Yes.
Q. And did you search it to confirm that the 6,849 files that the publishers' lawyers gave you were actually part of the 5 million sample?
MR. HOWELL: Objection. Form. Asked and answered.
A. Again, as I think I described, my process was to look at a few different portions of the metadata to understand what and was not included as part of that and what was a replacement, potential replacement of things that were in that sample.
Q. And did you compare the metadata in the 6,849 files that the publishers' lawyers gave you to the metadata in the 5 million record set?
MR. HOWELL: Objection. Form.
A. My recollection is what I did is I locked at -- I exported the metadata or had

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exported the metadata and was able to match that up with the documents that I downloaded, the 6,000.
And, again, it was fairly clear which ones were part of that -- I'll call it original sample, right, based on the doc ID and which ones were potential replacements.
Q. Now, it was publishers' lawyers that selected the -- strike that.
Publishers' lawyers identified the 6,849 files for your review in the sample song records, right?
MR. HOWELL: Objection. Form.
A. As part of my original report. Yes.
Q. And how did they go about selecting those particular 6,849 files?
MR. HOWELL: Objection. Form. Speculation.
A. I'd have to go back to the text of my report. But my general understanding is that they were things that were relevant to my analysis in that they were things that were song-and lyric-related.
Q. What criteria did the publishers' lawyers use to select those files?

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MR. HOWELL: Objection. Form.
A. I'm not aware of the specific criteria.
Q. Did they run search terms?
MR. HOWELL: Objection. Form. Asked and answered.
A. They may have run search terms for things like "song lyric." I don't recall specifically.
Q. Did they exclude documents they found unfavorable to their case?
MR. HOWELL: Objection. Form.
A. Again, I'm not sure what "unfavorable" would mean in this context. I'm not aware of specifically what they did or did not define as their criteria.
Q. Can you confirm whether publishers' lawyers did or did not specifically cherry-pick the best documents for their case to provide for you for review?
MR. HOWELL: Objection. Form. Vague. Speculation.
A. Again, they provided or identified a set of documents that were song- and lyric-related that were the subject of my analysis.

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To the extent there are other documents in there that, for example, also related to song- and lyric-related tasks but were not provided to me, the inclusion of those would create a higher number of total documents that were song- and lyric-related.
Q. You have no idea how they picked the documents they picked, correct?
MR. HOWELL: Objection to form. Asked and answered. Misstates prior testimony.
A. No. I -- the ones I reviewed were song- and lyric-related.
Q. And you have no idea how publishers selected the particular song- and lyric-related files for your review. Right?
MR. HOWELL: Objection. Form. Asked and answered.
A. Again, I was provided or identified -- those were -- the number here, the quantum, were identified to me, specific documents that were song- and lyric-related.
To the extent there were other song- or lyric-related documents that exist as part of the 5 million, and I suspect that there may be, they were not the subject of my analysis. The

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inclusion of those documents would create a larger quantum of total song- and lyric-related documents.
Q. You only looked at what lawyers for the publishers told you to look at, right?
MR. HOWELL: Objection. Form. Misstates prior testimony.
A. No. As part of my analysis, I looked at other documents, particularly in response to Dr. Bray. My sample song records, as I've defined them here, are the 6,849 records that I note and provide a listing of.
Q. Okay. And if we look at paragraph -- you use the phrase "song- and lyric-related."
A. Yes.
Q. If we look at paragraph 53, at the end, it says, "I have been provided by counsel with 6,849 conversations relating to songs and lyrics."
Is that "relating to songs and lyrics," what you mean by "song- and lyric-related"?
MR. HOWELL: Objection. Form.
A. Yes. I may use those terms interchangeably. Yes.
Q. What does it mean for a conversation to

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be relating to songs and lyrics?
MR. HOWELL: Objection. Form.
A. I would take that as the plain language of that statement, which is it describes or talks about songs or lyrics and uses those terms.
Q. So you said two things in that answer. Describes or talks about songs or lyrics and uses those terms.
Would a prompt, an output that includes lyrics from a song but does not include the word "song" or the word "lyric" be song- and lyric-related?
A. It certainly could be.
Q. And how many total song- and lyric-related conversations are there in the 5 million dataset?
MR. HOWELL: Objection. Form.
A. Again, that was not something I was asked to assess.
Q. How did publishers' counsel go about identifying whether a conversation was song- and lyric-related?
MR. HOWELL: Objection. Form. Asked and answered.
A. I'm not aware of counsel's processes.

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Q. You didn't give them any instructions on that, right?
MR. HOWELL: Objection. Form.
A. Correct. As I've said, those particular records were identified for me.
Q. You did not direct the selection of those records in any way, right?
MR. HOWELL: Objection. Form.
A. I did not.
Q. You don't know whether search terms were used in connection with obtaining those records, right?
MR. HOWELL: Objection. Form.
A. I'm just trying to remember. I know at least with respect to Anthropic employees, I was aware of certain search terms. I don't believe I was aware of any search terms specifically that were used on the Claude sample records.
Q. You'll agree that the 5 million record set of sample records includes files that don't have anything to do with songs or lyrics, right?
A. I'm sorry. Ask that one more time.
Q. Sure. You'll agree that the sample records set includes records that does not -- that do not have anything to do with songs or

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lyrics; right?
MR. HOWELL: Objection. Form.
A. Yes. There are records as part of the 5 million sample that are not song- or lyric-related. Agreed.
Q. And you don't know whether the 6,849 files that the lawyers for the publishers identified are the only song- and lyric-related records in the data, right?
MR. HOWELL: Objection to form. Asked and answered.
Go ahead.
A. I suspect there probably are. Dr. Bray identifies some that are not part of that sample set. So, again, to the extent there were more song- and lyric-related prompts and outputs, inclusion of those would only further increase the number of records in my analysis.
Q. But you, yourself, identified -- strike that.
The 6,849 files that publishers' lawyers identified are not representative of the sample records, correct?
MR. HOWELL: Objection. Form. Vague.
A. They are a subset of records that

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are -- that are relevant to my analysis.
Q. The 6,849 files the publishers' lawyers identified are not representative of the sample records, correct?
MR. HOWELL: Objection. Form. Vague.
A. They were not chosen randomly. They were specifically chosen based on whatever criteria, and they are relevant to my analysis in that they relate to song- and lyric-related tasks.
Q. They may be relevant, but they are not representative. Correct?
MR. HOWELL: Objection. Form. Vague.
A. How are you using the term "representative"?
Q. You're familiar with the statistical concept of a representative sample, right?
A. Yes.
Q. The 6,849 files that publishers' lawyers identified are not a representative sample of the sample records. Correct?
MR. HOWELL: Objection. Form. Vague.
A. Again, they were not chosen at random. So they were not statistically representative in that way. But, again, they are examples of the

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uses and examples of song-related tasks within the broader 5 million sample and within the broader Record Universe.
Q. They are not statistically representative in any way, correct?
MR. HOWELL: Objection. Form. Vague. Asked and answered.
A. I haven't endeavored to think about every conceivable way that something could be statistically representative.
Q. You cannot identify a single way in which the 6,849 files that the publishers' lawyers selected are representative of the sample records, correct?
MR. HOWELL: Objection. Form. Vague. Asked and answered.
A. That is not something I have attempted to think about, not part of my opinion.
Q. In your reply report, you reduced the number of records that you considered in your sample song records set. Right?
A. That is correct.
Q. You did not add any to the original 6,849, correct?
A. I did not.

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to me about what was and was not included as part of those -- part of the records I reviewed, and I certainly reviewed the email address which I understood is one way, at least, that those types of accounts could be identified.

Q. And did you take any steps to verify that the records for Claude accounts associated with publishers' investigators were excluded?

MR. HOWELL: Objection. Form.

A. Again, I think it is the same answer, in that the records that were identified to me, the representation was that they did not include Anthropic employees, investigators, or counsel, the various categories I've noted here, listed here. And I was able to confirm that, in fact, the email address for all of the records I reviewed in terms of the sample song records and work-in-suit records had an email address of "Redacted."

Q. Did you review any prompts or outputs that publishers' investigators submitted?

MR. HOWELL: Objection. Form. Vague.

A. Not as part of my affirmative analysis, no.

Q. Did you ask for a list of all accounts

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belonging to publishers?

MR. HOWELL: Objection. Form. Vague.

A. I don't know what you mean in that question. I'm sorry.

Q. Sure.

Did you ask for a listing of all email addresses belonging to publishers?

MR. HOWELL: Objection. Form. Vague.

A. No. I'm not sure what the purpose of that would be.

Q. Did you ask for a list of all email addresses belonging to publishers' counsel?

MR. HOWELL: Objection. Form. Vague.

A. No. Because, again, none of the records I reviewed had an email address other than "Redacted," so there would be no purpose to looking for or requesting email addresses that wouldn't be found.

Q. Did you ask for a list of all email addresses belonging to publishers' investigators?

MR. HOWELL: Objection. Form. Vague.

A. My answer would be the same. I didn't request it. I'm not sure of the purpose of doing so, what the purpose would be of that.

Q. Did you ask to have access to the

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prompts that publishers' investigators submitted to Claude?

MR. HOWELL: Objection. Form. I'm going to instruct the witness not to answer regarding conversations he may have had with publishers' counsel.

If you want to answer outside the context of those conversations, you may do so.

A. Can you ask your question one more time?

Q. Sure.

Did you ask to have access to the prompts that publishers' investigators submitted to Claude?

MR. HOWELL: Same objection, caution.

A. I -- no. It would have been outside the scope of my assignment.

Q. Did you review any prompts that publishers' investigators submitted to Claude?

MR. HOWELL: Objection to form. Vague.

A. Not that I can think of as part of my affirmative analysis.

Q. Can you independently verify that all of the 851 work-in-suit records from the opening report came from users who were not employees or

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investigators for publishers?

MR. HOWELL: Objection. Form. Vague.

A. Again, that would have been outside the scope of what I was asked to do in my assignment. What I was able to confirm, beyond the representation that was made to me, is that there was no indicia of that, based upon the email address field, which I understand was the way those type of accounts could potentially be identified.

Q. Can you independently verify all of the 814 work-in-suit records in your reply report came from users that were not employees of the publishers?

MR. HOWELL: Objection. Form. Vague.

Asked and answered.

A. Ask your question one more time.

Q. Sure.

Can you independently verify that all of the 814 work-in-suit records selected -- strike that.

Can you independently verify that all of the 814 work-in-suit records that you analyzed in your reply report came from users that were not employees of the publishers?

MR. HOWELL: Objection. Form. Vague.

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analysis of the revised billing data, right?
MR. HOWELL: Objection. Form.
A. It is an analysis of that underscore R or revised billing data. That is correct, it is based on that.
Q. And you identified a total of 64 -- sorry, 664 unique users, correct?
MR. HOWELL: Objection. Form.
A. That is the number of unique users in this exhibit, yes.
Q. Of those, 185 had paid accounts, right?
MR. HOWELL: Objection. Form.
A. I don't think that's what I quantified, no.
Q. There are free accounts listed here, correct?
A. There is an account type labeled "free." I see that, yes.
Q. And one of the accounts is -- one account type is max, right?
A. I see that's under the account type column, one of the available -- or one of the values that column contained was max, M-A-X.
Q. And one of the account types is pro, right?

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A. Yes. Again, I believe that column, account type, contained a value of pro in certain instances, yes.
Q. And those are flat fee user accounts, right?
MR. HOWELL: Objection. Form.
A. I have no basis of knowledge about the fee structure in any of these either way.
Q. Have you determined whether any of the accounts listed in Exhibit 8 pay by use as opposed to being a flat fee?
MR. HOWELL: Objection. Form. Vague.
A. No. That was not part of my assignment in this case.
Q. Can you return to your reply report. You can put Exhibit 8 away, if you like.
A. Twelve?
Q. Sorry. Yes, Exhibit 12. And if we can return to your reply report at page 120, paragraph 257.
Are you there?
A. I'm sorry. Let me orient myself. This is my expert report. I'm sorry. You want me to shift to Exhibit 3, which is my reply report?
Q. Correct.

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A. Yes. Go ahead.
Q. In your reply report, at page 120, there's a paragraph 257. And in that paragraph, you say in the middle "In total, I have now identified 664 unique users of which 185 had a billed amount greater than zero dollars."
Right?
A. I believe you read that correctly, yes.
Q. So there were 185 unique users who had paid some amount of money, correct?
MR. HOWELL: Objection. Form.
A. Again, I don't know outside of what the document I analyzed reflected. That 185 was a number of unique users that had a billed amount greater than zero.
Q. Do you know whether any of those unique users paid by the token?
MR. HOWELL: Objection. Form. Vague.
A. Again, my analysis is what is contained in my report. I explained the subject of my assignment, which is aligned here.
Q. And you do not have any basis to dispute that all of the users were flat fee accounts, correct?
MR. HOWELL: Objection. Form. Vague.

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Asked and answered.
A. I wasn't asked to analyze the nature of the payment structure for any of these. That was not part of my analysis or assignment.
Q. You identified total bills of $55,010; right?
A. That is correct. That's the number that is shown here.
Q. Did you review Dr. Bray's supplemental to rebuttal report?
MR. HOWELL: Objection. Form.
MR. TOMPROS: You're right. That's terrible.
BY MR. TOMPROS:
Q. Did you review the report that Dr. Bray submitted entitled "Supplement to Rebuttal"?
MR. HOWELL: Objection. Form.
A. I get the names of some of the reports a little bit. This is what he would have provided subsequent to my -- to this report (indicating) or something else?
Q. I believe so.
A. If it's what Dr. Bray submitted subsequent to my reply and supplemental report, I do remember opening it, giving it a cursory

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Q. You would agree that artificial intelligence has provided regulators with a greater opportunity to detect fraud, correct?
MR. HOWELL: Objection. Form. Vague. Speculation.
A. I think that's probably fair.
Q. Artificial intelligence has also provided regulators with a greater opportunity to detect market manipulation, correct?
MR. HOWELL: Objection. Form. Vague. Speculation.
A. I think that's -- I am aware that the regulators use AI and that may be of some benefit to them.
Q. And artificial intelligence has also allowed businesses to take a risk-based approach to compliance functions, correct?
MR. HOWELL: Objection. Form. Vague. Speculation.
A. I am certainly aware that companies use AI as part of their compliance program in certain instances, yes.
Q. Artificial intelligence has also allowed businesses to better allocate limited resources where they are needed the most, right?

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MR. HOWELL: Objection. Form. Vague. Calls for speculation.
A. I think that's generally consistent, yes, with what I've seen in my perspective.
Q. AI systems can process vast troves of unstructured data, right?
MR. HOWELL: Objection. Form. Vague. Speculation.
A. I think, in my experience, and as we've seen, AI can analyze a large amount of data. I think that's a fair characterization.
Q. It can also uncover hidden trends in data, right?
MR. HOWELL: Objection. Form. Vague. Calls for speculation.
A. Again, I think that's generally my, I'll say, opinion, but not opinion in this sense. I think that's my general take on one way in which AI can be used.
Q. Your company, StoneTurn, has shifted to a model where investigations are AI assisted, correct?
MR. HOWELL: Objection. Form. Vague.
A. It depends on the nature of the case, but we certainly use AI for certain aspects of certain investigation. That's absolutely true.

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Q. StoneTurn has a Gen AI search tool called "ASK," A-S-K, right?
MR. HOWELL: Objection. Form.
A. That, I'm less familiar with. I'm not sure I would -- I don't know if I'd characterize it that way.
(Document headed "Stoneturn, How Stoneturn Accelerates Fact-Finding by 75% with Reveal ASK" marked Exhibit 23.)
BY MR. TOMPROS:
Q. Mr. Dennis, you are being handed a document marked as Dennis Exhibit 23. It's a multipage --
A. Ah.
Q. -- document with the heading at the top "StoneTurn, How StoneTurn Accelerates Fact-Finding by 75% with Reveal ASK."
Do you see that?
A. I do.
Q. What is Exhibit 23?
MR. HOWELL: Objection. Form. Vague. Speculation.
A. This is -- well, it appears to be an article written by one of my partners, David Holley, that's entitled "How StoneTurn Accelerates Fact-Finding by 75 percent with Reveal ASK."

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Q. At the bottom of the first page of Exhibit 23, under the solution, "Reveal ASK cuts to the facts intuitively and with low effort."
The first paragraph says "With Reveal, and particularly its Gen AI search tool ASK, StoneTurn shifted to a model where investigations are both centralized and AI assisted."
Do you see that?
A. I do.
Q. Is that statement true?
MR. HOWELL: Objection to form. Speculation.
A. Again, this is not an article that I wrote. I'm aware that the firm uses Reveal, which is a third-party document review platform, not like Relativity, which I expect you all use probably around here. It's a very common one. Reveal is another one for document review. Many of these document review software platforms, including both Reveal and Relativity, have layered in AI functionality that allows for the -- again, presumably ASK, I'm not familiar

CERTIFICATE

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

I, Janet M. McHugh, a Registered Merit Reporter and a Notary Public within and for the Commonwealth of Massachusetts do hereby certify:

THAT JOSHUA DENNIS, the witness whose testimony is hereinbefore set forth, was duly sworn by me and that such testimony is a true and accurate record of my stenotype notes taken in the foregoing matter, to the best of my knowledge, skill and ability; that before completion of the deposition review of the transcript was requested.

I further certify that I am not related to any parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 13th day of March, 2026.



JANET M. MCHUGH
Notary Public
My Commission Expires:
July 16, 2028

No. 621067

Re: Deposition of Joshua Dennis
Deposition Date: March 9, 2026
Case: Concord Music Group v. Anthropic
Return to: transcripts@planetdepos.com

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71:25	locked	looked	typographical error
83:20	I provided my counsel	I was provided by counsel	typographical error
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240:25	recommendation	representation	typographical error
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315:11	Dr. Bilms	Dr. Bilmes	typographical error
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327:20	Dr. Bilms	Dr. Bilmes	typographical error
328:5	Dr. Bilms	Dr. Bilmes	typographical error
340:17	Title	Tidal	clarity
343:23	Dr. Bilms	Dr. Bilmes	typographical error

April 13, 2026

Date

Signature