EXHIBIT 117

(FILED UNDER SEAL)

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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 - ATTORNEYS' EYES ONLY -
SUBJECT TO PROTECTIVE ORDER
REMOTELY CONDUCTED VIDEOTAPED DEPOSITION OF
KENT DRAUGHON AS CORPORATE DESIGNEE ON BEHALF OF
CAPITOL CHRISTIAN MUSIC GROUP
WEDNESDAY, NOVEMBER 5, 2025
9:02 A.M. CST

JOB NO.: 606143
PAGES: 1 - 269
REPORTED BY: KARISA EKENSEAIR, CCR RPR RMR RDR
CA CSR #14546

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DEPOSITION OF KENT DRAUGHON, AS CORPORATE DESIGNEE, 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.

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A P P E A R A N C E S

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BRAD SYDORICK, VIDEOGRAPHER

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PROCEEDINGS

THE VIDEOGRAPHER: Here begins Media No. 1 one in the videotaped deposition of Kent Draughon, in the matter of Concord Music Group v Anthropic, in the United States District Court, Northern District of California, San Jose Division, Case Number 24-CV-03811-EKL(SVK).

Today's date is November 5, 2025, and the time on the video monitor is 9:02 a.m. central Standard time.

The remote videographer today is Brad Sydorick representing Planet Depos. And all parties of this video deposition are attending remotely.

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

MS. MEHTA: Yes, good morning. Sonal Mehta from WilmerHale on behalf of Anthropic. With me today is my colleague Lakshmi Reddy.

MR. KAPLAN: And this is Alex Kaplan from Oppenheim + Zebrak representing plaintiffs in this case and representing the witness and his company. Also on the Zoom video, although he won't be speaking, is Patrick Ogilvy who is in-house counsel with CCMG.

THE VIDEOGRAPHER: The court reporter today is Karisa Ekenseair representing Planet Depos. And the witness will now be sworn.

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

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

KENT DRAUGHON

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. Draughon.

A Good morning.

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

A Nice to meet you.

Q Could I ask you state your full name and address for the record, please?

A Yes. Kenton Boyd Draughon, and I live at [redacted].

Q And would you state your business address for the record as well? Thank you.

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A Yes. It's 1234 Martin Street, in Nashville, Tennessee 37203. We're in Suite 300.

Q Thank you. Have you ever been deposed before?

A Yes, I have.

Q How many times?

A Twice before.

Q What kind of cases were those in?

A The first was a medical malpractice case. The second was a copyright case.

Q Was type of copyright case was it?

A Yes. It was a copyright infringement complaint.

Q And was -- were you with Capitol Christian Music Group at the time of that deposition?

A Yes, I was.

Q And was Capitol Christian Music Group the plaintiff in that case?

A No, we were not.

Q You were the defendant or were you a third party?

A We were named with defendants.

Q Okay.

A Is the way to say that.

Q Okay. And what was the allegation of

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[redacted]

Q (Technical disruption) the music industry, Mr. Draughon?

A I'm sorry, your audio cut out there. What was that?

Q I'm sorry. Just how long have you worked in the music industry?

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A Been blessed to do this for more than 30 years now.

Q In your 30 years of experience in the industry, have you -- do you think it's typical for songwriters to copyright lyrics separately from the rest of the musical composition?

MR. KAPLAN: Form objection; and scope.

A Just stating that back to you. Did you ask do I think it's typical --

Q Yes.

A -- of writers to register lyrics separate from melody? I do not think it's typical.

[redacted]

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[redacted]

Q If we could, let's go to Exhibit 5 which will be -- and we'll come back to your declaration at different points through the day today, so you might want to leave that one handy.

MS. MEHTA: But I'm going to go ahead and mark as Exhibit 5 Tab 13, please.

REMOTE TECHNICIAN: Yes. One moment.

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(Exhibit 5 marked for identification.)

REMOTE TECHNICIAN: Should be in the Chat now.

Q Great. If you could look at Exhibit 5, Mr. Draughon, this is a document bearing the number UPMG 0000000578. And then it is a table that has a list

[redacted]

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Q And did you speak with Mr. Kaplan about the substance of your testimony here today?
MR. KAPLAN: You can answer that question yes or no.
A No.
Q Do you speak with him about any of the questions or the answers that you gave? That's a yes-or-no question.
MR. KAPLAN: I'm going to direct him not to answer. He's already said he didn't speak about the substance of his testimony. Now you're prying into conversations with counsel.
MS. MEHTA: No. I'm just asking -- I want to make sure we're on the same page about what "substance of the testimony" means.
Q So I'm only asking, again, as a yes-or-no question if you spoke with Mr. Kaplan about the questions or the answers you've provided?
MR. KAPLAN: Same thing, sorry.
MS. MEHTA: So are you instructing him not to answer? I don't understand what the "sorry" means there, Alex.
MR. KAPLAN: You asked him if he spoke about the substance of his -- of the testimony, which is the same thing as asking if he spoke about questions

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and answers. And -- and so, he's answered that. And now you're prying into more about the substance of -- of our discussion. I mean, I --
MS. MEHTA: No, I'm not. What I'm doing is making sure because he paused after I said "substance of the testimony," I'm just making sure that he and I are on the same page about what "substance of the testimony" means. And I asked a yes-or-no question. I didn't ask anything about what was discussed. I just asked whether he talked to -- whether --
Q Mr. Draughon, where you talked to Mr. Kaplan, your counsel, about the questions and answers that you provided and in the deposition; yes or no?
MR. KAPLAN: No. I'm not going to -- I'm sorry, I'm -- I'm going to direct him not to answer. I'm not going to let you ask questions about conversations between him and his lawyer. And he didn't pause or anything as you're suggesting after you asked him a question.
MS. MEHTA: Are you instructing him not to answer?
MR. KAPLAN: Yes.
Q Mr. Draughon, I take it you're going to

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accept that instruction?
A I am.

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[redacted]

MS. MEHTA: We've been going for -- I don't even know how long, quite a while, and we went through a long litany of questions, so maybe now is a good time for a break.

THE WITNESS: Understood.

THE VIDEOGRAPHER: We are going off the record. The time is 11:40.

(Whereupon a break was had.)

THE VIDEOGRAPHER: We are back on the record. The time is 11:51.

BY MS. MEHTA:

Q Mr. Draughon, did you talk to counsel during the break?

A Did not.

Q Did you talk to either of your colleagues or anyone during the break?

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A No.

[redacted]

Q Going back to your declaration that was Exhibit 4, if you could go to paragraph 24?

A Yes.

Q The second sentence there says, "In the past, CCMG songwriters have declined requests to change just a few words in a given song given that even minor changes in lyrics can have an outsized impact on the meaning of a song."

Do you see that?

A I do see that, yes.

Q And that's something you said to the Court under oath, correct?

MR. KAPLAN: Form objection.

A Yes.

Q And I take it you stand by that and believe that to be true?

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A Yes.

Q Are you familiar with -- or you can go back and look at the list of songs if you need to, list of compositions if you need to.

The composition "God of Wonders" is one of the asserted works in this case, right?

A I believe it is. Yes. I see it.

MS. MEHTA: Let's go ahead and mark if we could as Exhibit 9 Tab 22.

(Exhibit 9 marked for identification.)

REMOTE TECHNICIAN: Yes, one moment. That was 22?

MS. MEHTA: That's right.

Q Okay. You should have -- there it is. You should now have Exhibit 9.

A Downloading. Okay. I see.

Q Right. Exhibit 9 is a LyricFind -- a screenshot or printout from LyricFind for "God of Wonders."

Do you see that?

A I do see that.

Q Okay. And LyricFind is a website that Capitol CMG licenses its lyrics to, correct?

A That's correct.

Q So this would be an authorized license --

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licensed or authorized production of the lyrics for that composition; is that right?

MR. KAPLAN: Form objection.

A This is authorized.

Q Okay. Now, if you could go to the stanza that starts "So Early in the morning."

A Yes.

Q And it says, "As I stumble into darkness (I will call Your name by night)."

Do you see that?

A I do see that.

Q Okay. Now, if you could go to the stanza that starts, "Sing God of wonders."

A Yes.

Q Okay and if you look at that, it says -- the third line down says: The pressure is low, reveal your heart to me.

Do you see that?

A I do see that.

Q Okay.

MS. MEHTA: Now, I'm going to have marked as Exhibit 10 Tab 21.

REMOTE TECHNICIAN: One moment.

(Exhibit 10 marked for identification.)

REMOTE TECHNICIAN: Should be in the Chat.

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MR. KAPLAN: Form objection; misstates the document.
A Misstates the document. My familiarity with the songs is what I used to make this statement.
Q Okay. So and that answer when you just said "misstates the document," you're just repeating what your lawyer said in his objection?
A Yes.
Q Okay. My question didn't misstate the document. It was reading right from the declaration, wasn't it?
A I see paragraph -- paragraph 17.
Q Okay.
MR. KAPLAN: No. That misstates -- that misstates the document. The word "compares" is not in the document and that was in your question, so that is wrong.
Q My question, sir, is: You said, "I have confirmed that the lyrics to CCMG works available on a lyric aggregator, lyricfind.com, are genuine and materially accurate."
Do you see that?
A I do.
Q And you attested to that under oath, right?
A I did.

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A I do see 4070, yes.
Q Okay. So that was a document that was provided to Anthropic by the publishers in this case. I'll represent that to you. Okay?
A Okay.
Q And you see this is a printout from LyricFind for a song entitled "Great is the Lord."
Do you see that?
A I do see that.
Q Okay. And if you go down and look at the bottom of the lyrics for that song, it says "writers."
Do you see that?
A Struggling. It's pretty faint. Let me blow it up. I do see that.
Q Okay. And the writer listed there is Y. Asaph Alexander Ward.
Do you see that?
A I do see that.
Q Is Y. Asaph Alexander Ward the songwriter for the song, "Great is the Lord"?
A I'm trying to remember off the top of my head. I know of one of the writers. I don't know if he is the sole writer.
Q Do you know if he is one of the writers?

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A I don't know if Asaph Alexander Ward is one of the writers.
Q Do you understand that Michael W. Smith was one of the writers for that song?
A The top of my head, yes. He is an artist on this particular one and I thought was at least one of the writers of it.
MS. MEHTA: Why don't we mark as Exhibit 14 Tab 17, please.
REMOTE TECHNICIAN: Yes.
(Exhibit 14 marked for identification.)
Q So you should have Exhibit 14 available to you. And if you open that up, you will see the copyright registration for "How Great is the Lord."
Do you see that?
A Almost there. Song title, "Great is the Lord." Yes.
Q Okay. And if you look at page 2 of that, you'll see that the songwriters for that are listed as Michael W. Smith and Deborah D. Smith.
Do you see that?
A Look at page 2, Michael Smith and Deborah Smith. I do see that.
Q Okay. And you don't see Y. Asaph Alexander Ward listed as a songwriter for this composition, do

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you?
A I do not.
Q Okay. So if we go back then to Exhibit 13, that printout from the LyricFind website which is one of the authorized lyric sites, that includes the wrong information in terms of who the writer was for the song "Great is Our Lord," correct?
MR. KAPLAN: Form objection; lacks foundation.
A Seems so.
Q Has Capitol CMG -- strike that. Let me ask the question differently.

[redacted]

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[redacted]

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Q Okay. Let me go to the -- let me have you go to the deposition notice that we looked at earlier with the topics.
A So which number would that be? I'm sorry.
Q Sure. That would be Number 1.
A Number 1.
Q I'll have you look at Topic 7, and also Topic 8.
A Yes.
Q Okay. And you testified earlier that you prepared to testify on behalf of CCMG with respect to Topic 7 and 8, correct?
A Yes.
Q Okay. So let me go back then to the question I asked a moment ago.

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[redacted]

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[redacted]

MS. MEHTA: Okay. We've been going for a while. Why don't we take a break.
THE WITNESS: Fair enough.
THE VIDEOGRAPHER: Okay. We are going off the record. The time is 1:01.
(Whereupon a break was had.)

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THE VIDEOGRAPHER: We are back on the record. The time is 1:42.
BY MS. MEHTA:
Q Okay. Mr. Draughon, welcome back.
Did you speak with counsel or any of your colleagues during the last break?
A No.
Q I'm going to have you turn to the next exhibit, which will be marked as Exhibit 15, and that's Tab 31.
(Exhibit 15 marked for identification.)
Q That should be in the Chat for you.
A Okay. I have 15.
Q Great. So if you could take a look at Exhibit 15, this is, as I understand it, a gross revenue sheet for "How Great is Our God"; is that right?
A I believe that's right.
Q Okay. And what comprises a gross revenue summary?
MR. KAPLAN: Form objection.
A This is royalty earnings for that song.
Q And where did the data in the spreadsheet come from? Was it pulled from a database of some sort?

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A This is effectively a royalty query from statement data.
Q When you say "statement data," what do you mean?
A Royalty statements that come in, this is effectively a summation of all those royalty statements.

[redacted]

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right?
A Yes.
Q And "Dare You to Move" is a song in CCMG's catalog, right?
A That's correct.
Q And "Anaconda" is a song with explicit lyrics, right?
A I believe so, yes.
Q Okay. And that's the type of mash-up of songs from your catalog with explicit lyrics that you were expressing concern about in that other declaration, right?
A That's correct.
Q Okay. In this instance, it was you who asked Claude to create a mash-up of "Dare You to Move," a Christian song from your catalog, with "Anaconda," a song with explicit lyrics; isn't that right?
A Yes.
Q Anthropic's Claude didn't suggest to you that it wanted to do a mash-up of a Christian song from your catalog with a song with explicit lyrics, did it?
MR. KAPLAN: Form objection.
A It did not.

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Q So in the instance where there is hypothetically a mash-up of a Christian song from your catalog with an explicit song or a song that you think would harm the meaning or the value of the song in your catalog, that's being done at the direction of or based on the prompting of the user of Claude, not by Anthropic laud itself; isn't that right?
MR. KAPLAN: Form objection; and calls for legal conclusion; outside the scope.
A Not understanding your question. I was -- if you could restate it.
Q I can try again.
Can you think of any instance in which Anthropic's Claude has generated a mash-up of one of your songs of faith or worship with an explicit song on its own without being prompted to do so by a user? Have you ever seen or heard of that?
MR. KAPLAN: Form objection; and foundation; scope.
A I have not seen that.
Q Have you ever seen or heard of an instance in which Claude rewrote or mashed up lyrics to one of your works and then that work went -- or that rewrite or mash-up went viral?

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A No. I'm trying to prevent that.
Q Have you ever seen that happen?
A Not yet.
Q Have you ever seen an instance in which any rewrite or mash-up of one of your songs by any AI tool or -- or model has gone viral or otherwise spread in a way that was harmful?
A Not yet.
Q You also discuss in your declaration here a prompt and -- in which Claude was prompted to write an atheist version of "Meant to Live" by Switchfoot.
Do you recall writing about that?
A If I could refer back, is that Document 4?
Q No. I think this is in the same --
A Oh.
Q -- declaration.
A Refresh my memory, if I could.
Q I'm sorry, you are right. It's in Exhibit 4.
A Exhibit 4. Okay.
Q Yeah.
A I'm sorry, you were referring to which song?
Q Where you --
A What paragraph?
Q Yes. Where you prompted -- where it says,

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"Claude was prompted to write an atheist version of the song 'Meant to Live' by Switchfoot."
A Just trying to find that paragraph.
Q Yeah. Of course. I'm -- I'm trying to find it too. That was in paragraph 24 at the top of page 7.
A Okay. I'm in Document 4.
Q Tab -- Exhibit 4, your declaration.
A Right.
Q Paragraph 24, and this is the paragraph that spans pages 6 and 7, so I'm on the part that's on page 7.
A Page 7.
Q And you say, "For instance, when Claude is prompted to write an atheist version of 'Meant to Live' by Switchfoot."
Do you see that?
A I do see that now. Yeah.
Q Yeah. And then it says it interspersed the lyrics of that song with a text that's completely antithetical to the original Christian-based meaning of the song, right?
A Yes. I see that, and stand by that.
Q In that particular instance, did you prompt Claude to write an atheist version of "Meant to

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 9th day of November, 2025.



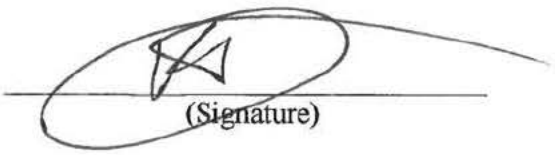
Karisa Ekenseair, CCR RPR RMR RDR
CA CCR #14546

No. 606143

Re: Deposition of Kent Draughon, Designated Representative
Date: 11/5/2025
Case: Concord Music Group -v- Anthropic
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Page	Line	Correction/Change and Reason
12	11	Change "was" to "what"; Mistranscription
13	7	Change "Waymaker" to "Way Maker"; Mistranscription
15	5	Change "Waymaker" to "Way Maker"; Mistranscription
34	2	Add "off" to beginning of answer, before "the"; Clarification
31	9	Change "Marsh" to "March"; Clarification
47	12	Change first "control" to "controls"; Clarification
63	8	Add "the" after "broadly,"; Clarification
84	2	Change "versus" to "various"; Mistranscription
116	4	Change "heaving" to "heaven"; Mistranscription
134	5	Add "off" to beginning of answer, before "the"; Clarification
158	21	Change "rules" to "rolls"; Mistranscription
189	14	Change "non Capital" to "non Capitol"; Mistranscription

12/17/25
(Date)


(Signature)

No. 606143

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ACKNOWLEDGMENT OF DEPONENT

I, Kent Draughon, Designated Representative, 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.

12/17/25 KD
(Date) (Signature)