# EXHIBIT 122

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC.; CAPITOL CMG, INC. D/B/A ARIOSE MUSIC, D/B/A/ CAPITOL CMG GENESIS, D/B/A/ CAPITOL CMG PARAGON, D/B/A GREG NELSON MUSIC, D/B/A JUBILEE COMMUNICATIONS, INC., D/B/A MEADOWGREEN MUSIC COMPANY, D/B/A MEAUX HITS, D/B/A MEAUX MERCY, D/B/A RIVER OAKS MUSIC, D/B/A SHEPHERD'S FOLD MUSIC, D/B/A SPARROW SONG, D/B/A WORSHIP TOGETHER MUSIC D/B/A WORSHIPTOGETHER.COM SONGS; UNIVERSAL MUSIC CORP. D/B/A ALMO MUSIC CORP., D/B/A CRITERION MUSIC CORP., D/B/A GRANITE MUSIC CORP., D/B/A IRVING MUSIC, INC., D/B/A MICHAEL H. GOLDSEN, INC., D/B/A UNIVERSAL - GEFFEN MUSIC, D/B/A UNIVERSAL MUSIC WORKS; SONGS OF UNIVERSAL, INC. D/B/A UNIVERSAL - GEFFEN AGAIN MUSIC, D/B/A UNIVERSAL TUNES; UNIVERSAL MUSIC - MGB NA LLC D/B/A MULTISONGS, D/B/A UNIVERSAL MUSIC - CAREERS D/B/A UNIVERSAL MUSIC - MGB SONGS; POLYGRAM PUBLISHING, INC. D/B/A UNIVERSAL - POLYGRAM INTERNATIONAL TUNES, INC., D/B/A UNIVERSAL - POLYGRAM INTERNATIONAL) PUBLISHING, INC., D/B/A UNIVERSAL - SONGS OF POLYGRAM INTERNATIONAL, INC.; UNIVERSAL MUSIC - Z TUNES LLC D/B/A NEW SPRING PUBLISHING D/B/A UNIVERSAL MUSIC - BRENTWOOD BENSON PUBLISHING, D/B/A UNIVERSAL MUSIC - BRENTWOOD BENSON SONGS, D/B/A UNIVERSAL MUSIC - BRENTWOOD BENSON TUNES, D/B/A UNIVERSAL MUSIC - Z MELODIES, D/B/A UNIVERSAL MUSIC - Z SONGS; and ABKCO MUSIC, INC.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case Number:
5:24-cv-03811-EKL
SVK

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HIGHLY CONFIDENTIAL--ATTORNEYS' EYES ONLY
VIDEOCONFERENCED and VIDEO-RECORDED
30(b)(6) DEPOSITION of
Anthropic PBC, by and through its Designated
Representative,
JANE J. LEIBROCK
San Francisco, California 94111
Wednesday, October 15, 2025

Reported Stenographically by:
MARY J. GOFF
CSR No. 13427
WA CSR No. 21030779
Job No. 603739
PAGES 1-65

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HIGHLY CONFIDENTIAL--ATTORNEYS' EYES ONLY
VIDEOCONFERENCED and VIDEO-RECORDED DEPOSITION of
JANE J. LEIBROCK, Volume I, taken on behalf of
Plaintiff Publishers, Oppenheim + Zebrak, LLP, at
WilmerHale, 50 California Street, Suite 3600,
San Francisco, California 94111, beginning at
9:09 a.m. and ending at 10:55 a.m., on Wednesday,
October 15, 2025, before MARY J. GOFF, California
Certified Shorthand Reporter No. 13427 and WA CSR
No. 21030779.

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APPEARANCES:

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ALSO PRESENT: Ian Chen, In-house counsel Anthropic
Videographer: Gary Garcia

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WITNESS EXAMINATION

JANE J. LEIBROCK

Volume I

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San Francisco, California
Wednesday, October 15, 2025
9:09 a.m.

THE VIDEOGRAPHER: Here begins Media Number 1, in the videotaped deposition of Jane Leibrock, in the matter of Concord Music Group, versus Anthropic, in the United States District Court, Northern District of California, San Jose Division, Case Number 3:24-cv-05417-WHA.

Today's date is October 15, 2025. The time on the video monitor is 9:09 a.m.

The videographer today is Gary Garcia, representing Planet Depos. This video deposition is taking place at 50 California Street, Suite 3600, San Francisco, California 94111.

Would counsel please voice identify themselves and state whom they represent, starting with the taking attorney.

ATTORNEY CHUNG: Timothy Chung, for Plaintiff Publishers, from Oppenheim & Zebrak.

ATTORNEY GOOCH: Taylor Gooch, representing -- with WilmerHale, representing Anthropic.

With me here today is Ian Chen from -- in-house counsel for Anthropic, as well as the

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witness.

THE VIDEOGRAPHER: The court reporter today Mary Goff, representing Planet Depos the witness will now be sworn.

THE COURT STENOGRAPHER: My name is Mary Goff. I am a California Certified Shorthand Reporter, CSR Number 13427. Today's proceedings are being captured by stenographic means.

JANE J. LEIBROCK,

Being first duly sworn or affirmed to testify to the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION

BY ATTORNEY CHUNG:

Q Good morning, Ms. Leibrock.

**A Good morning, Mr. Chung.**

Q My name is Timothy Chung. As you heard, I represent Plaintiff Publishers in this case.

I would like to ask you just a few introductory questions, starting with: Have you ever been deposed before?

**A I have not been deposed before.**

Q Okay. That's -- I would like to go over some ground rules just so we're on the same page.

During the deposition I will be asking you

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researchers like myself; people who work in accounting, advertising, the medical fields.
Any sort of professional who is wanting to complete their core work using CLAUDE.
Q Can you define "knowledge workers" for me?
A At Anthropic, "knowledge workers" means workers who are primarily working in some way with computers in order to innovative, to develop novel and valuable services, yeah.
Q Does Anthropic target nonknowledge workers?
A To a limited degree, Anthropic does, but it's not been our primary audience or market that we're targeting.
Q Okay. Would those nonknowledge workers include ordinary, let's say, retail users?
A Yes.
Q Does Anthropic maintain any metrics regarding the acquisition of CLAUDE users?
A Yes.
Q What metrics?
A We track the growth of our absolute user base and also the number that are active or retained over a period of time.
Q Does Anthropic maintain any advertising

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metrics such as the number of impressions, for example?
A That is not within my scope of work, so I can't -- I can't confidently answer that.
Q Does Anthropic maintain any metrics regarding the cost per customer acquisition?
A I have the same answer to that.
Q Does Anthropic maintain any metrics related to click-through rate?
A I have the same answer.
Q What about engagement rate?
A Engagement with advertising?
Q Correct?
A For that, it's also outside -- outside the scope of my work.
Q What about -- does Anthropic maintain any metrics related to the return on ad spending?
A That's also outside the scope of my work.
Q Earlier you identified several marketing channels that Anthropic utilizes in advertising CLAUDE.
Do you remember that?
A Yes.
Q Which of those marketing channels have been the most successful in terms of acquiring new

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CLAUDE users?
A That's something that I don't have the answer to based on the scope of my work. You would have to ask someone who tracks those individual metrics.
Q Do you know which of those marketing channels Anthropic has utilized the most?
A I wouldn't be able to say based on the scope of my work.
Q Is it fair to say that Anthropic offers both free and paid versions of CLAUDE?
A Yes.
Q Are you aware of what the primary method is by which Anthropic acquires the majority of its CLAUDE users?
A Can you be more specific when you say "the method by which"?
Q Which advertising strategy or perhaps sales strategy is the primary method by which Anthropic obtains a majority of its CLAUDE users?
A I'm not aware of that based on the scope of my work. You would have to ask -- ask the folks that are studying who is coming in through which channels.
Q And who are those individuals who are --

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who would have knowledge of this?
A I can name a couple of my workers that I believe have knowledge with that.
Dave Jacobs and Sophie Ho are the people I would turn to if I wanted those specific numbers internally.
Q Did you talk with any of those individuals in preparation for this deposition?
A Yes.
Q And did you discuss -- scratch that.
When you spoke with Mr. Dave Jacobs and Sophie -- Ms. Sophie Ho, when did you have those discussions?
A Yesterday.
Q And for how long?
A For 30 minutes each.
Q What did you discuss?
A We discussed the top-level strategy that we're employing at Anthropic for our marketing, and I asked them questions to clarify areas that related to strategy that I didn't have recent or complete knowledge of.
Q And did you discuss the efficacy of Anthropic's advertising strategies?
A We did not discuss the efficacy in terms

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**of how it had been measured in terms of, like, the numbers of what had been effective. We discussed the methods through which we measure that.**

Q What do you mean by "the methods through which you measure"?

**A We discussed the vendors and methods that we use in order to do that measurement.**

Q And who are those vendors?

**A I'm not going to remember the exact name, but I know that there's a leading brand measurement company that we work with to learn about our brand awareness externally, for instance.**

Q And do they provide any metrics related to brand awareness of Anthropic?

**A We did discuss that vendor providing us metrics.**

Q Can you identify any of those metrics?

**A I can't identify the specific ones, because we didn't discuss the specific metrics.**

Q Would it include the size of the user base?

**A We discussed this vendor measuring things such as the proportion of our audience that is aware of our brand.**

Q The proportion of your audience? Can you

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define "audience"?

**A We have a target audience that's called the "problem solver" that's defined by various attitudes, so we work with this vendor to measure what proportion of that audience is aware of us.**

Q What CLAUDE features or capabilities does Anthropic promote to attract CLAUDE users?

**A Primarily Anthropic promotes CLAUDE's accuracy, strength, position on the frontier as a model that lets knowledge workers and problem solvers work deeply completing their core work in more efficient, more powerful, and higher quality ways.**

Q Can you identify some of those specific capabilities?

**A When you say "capabilities," do you mean capabilities of the model?**

Q Whatever aspects of the CLAUDE model that Anthropic specifically promotes so that knowledge workers can meet their goals.

**A We promote CLAUDE's safety as a model, its accuracy, its high intelligence, its skill at working with a large amount of knowledge by which we mean data that's been provided by the user to the model, its ability to show its chain of thought or**

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**reasoning to do deep research, and to work with software code or to debug code.**

**A lot of the usage, really, it's to software code.**

Q Do the features that Anthropic promotes, include CLAUDE's ability to be creative?

**A We focus on the user's ability to be creative with CLAUDE.**

Q How could they be creative with CLAUDE?

**A Are you asking for a general answer or an example?**

Q Both will suffice.

**A In general, users can be creative with CLAUDE when they have a -- any kind of work involving creativity.**

**It could be a scientific discovery. It could be legal work where they have ideas and CLAUDE acts as the collaborator, helping them to develop their ideas and think through them.**

**So a specific example might be a biologist who is reading a lot of papers and has a new theory. Then they might talk to CLAUDE about it, ask CLAUDE to poke holes in it, and that shows them the places where they need to improve their ideas.**

Q What about creative writing? Is that a

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feature that Anthropic promotes to potential users?

**A Can you define "feature" in this context?**

Q How would you define "feature"?

However, it's used at Anthropic internally.

**A For us at Anthropic, we use the word "feature" to mean a feature of our product.**

**So it would be an aspect of functionality such as a feature that lets a user create a certain style that they write in, so that's what we mean by "feature."**

Q And how would you define "capability"?

**A There could be a capability of CLAUDE, which would be an ability of the product -- or not CLAUDE, but CLAUDE.AI, our app, that would be a capability such as it can respond to your prompts.**

**Or there -- there's also a level of capability at the model where the model has certain capabilities that, in turn, enable the capabilities of the product.**

Q Is creative writing a use case that Anthropic promotes to potential users?

**A In terms of promotion, I'm not aware with the level of detail as to whether that has been promoted in a specific advertisement, for example.**

ERRATA SHEET
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CASE: Concord Music, et al., v Anthropic

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_____
JANE J. LEIBROCK
Subscribed and sworn to before me
this _____ day of _____, 2025.
_____
Notary Public