EXHIBIT 123

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., et al.,

Plaintiffs,

-against- Case No: 5:24-cv-03811-EKL-SVK

ANTHROPIC PBC,

Defendant.

VIDEOTAPED DEPOSITION of ROBERT LEONARD, taken by the Defendant, pursuant to Notice, held via ZOOM, on February 27, 2026, at 10:29 a.m., before a Notary Public of the State of New York.

A P P E A R A N C E S:

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2600 El Camino Real, Suite 400
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BY: SONAL MEHTA, ESQ.
LAKSHMI C. REDDY, ESQ.

ALSO PRESENT:
RAECHEL MEYEROWICH- Remote Tech
JEAN-LOUIS ZIESCH- Videographer
KARL JOHNSTON-Anthropic

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EXHIBITS

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THE REMOTE TECH: Thank you to everyone for attending this proceeding remotely, which we anticipate will run smoothly. Please remember to speak slowly and do your best not to talk over one another. Please be aware that we are recording this proceeding for backup purposes.

Any off-the-record discussion should be had away from the computer. Please remember to mute your mic for those conversations.

If you are unable to connect with video and are connecting via phone, please identify yourself each time before speaking. I apologize in advance for any technical-related interruptions. Thank you.

THE VIDEOGRAPHER: This is the beginning of Media Number 1 of the videotaped deposition of Dr. Robert Leonard in the matter of Concord Music, et al., versus Anthropic, et al., in the US District Court, Northern District of California, San Jose Division, case No. 5:24-cv-03811-EKL-SVK.

Today's date is February 27, 2026. The time on the video monitor is 10:29 a.m. Eastern Standard Time. The certified remote

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videographer today is Jean-Louis Ziesch, representing Planet Depo. All parties of this video deposition are attending remotely.

Will counsel please identify yourself and state whom you represent.

MS. MEHTA: Good morning. Sonal Mehta from WilmerHale on behalf of the defendant, Anthropic. With me is my colleague, Lakshmi Reddy. And I believe the inhouse counsel at Anthropic, Karl Johnston, is also on the line.

MR. GUERRA: Andrew Guerra of Oppenheim + Zebrak on behalf of the plaintiffs.

THE VIDEOGRAPHER: The court reporter today is Brooke Perry, representing Planet Depo.

The witness will now be sworn.

R O B E R T L E O N A R D, the witness herein, having been first duly sworn by a Notary Public of the State of New York, was examined and testified as follows:

THE REPORTER: Please state your name for the record.

THE WITNESS: Robert Leonard.

THE REPORTER: Please state your address for the record.

THE WITNESS: 51 Lake Avenue, Mill Neck, New York 11765.

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EXAMINATION BY
MS. MEHTA:

Q. Good morning, Dr. Leonard.
A. Good morning. How are you?
Q. I'm good. How are you?
A. Good.
Q. How many times have you been deposed, sir?
A. I'm not sure. Around 30.
Q. Okay. So you're familiar --
A. Yeah. I could count it up if you want.
Q. No. I just wanted to confirm you're familiar with the process.
A. Somewhat.
Q. Is there anything -- well, let me start with this: You understand that you're testifying under oath today, just as you would before the judge and the jury in the courtroom in San Jose?
A. I do.
Q. Is there anything that would prevent you from proving your most truthful and accurate testimony here today?
A. No.
Q. We are doing this by Zoom, so it's going to be very important that we both work hard to not talk over each other. I'm going to do my best not to interrupt your answers, and I'll ask you to do the same with respect to my questions, okay?

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A. Yes.
Q. If at any point you have any question about my question or you are not sure what I'm asking, please ask me for clarification, okay?
A. Yes.
Q. And if I don't receive a request for clarification, I'm going to assume that you understood the question, and you're providing your best testimony and response, fair?
A. Yes.
Q. We'll do breaks about every hour, hour and a half. If you need a break in less time than that, let me know, and I will finish up that line of questioning, and then we'll take a break, okay?
A. Very good.
Q. You -- when were you first engaged for this matter?
A. I believe it was 2023.
Q. Okay. And about how much time total have you spent working on the matter since you were first engaged?
A. I really -- I really don't know.

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Q. 12 hours? 25 hours? Hundreds of hours? Any estimate?

MR. GUERRA: Object to the form.

A. It certainly wasn't 12 or 25, right, over the years. But I really don't know, off the top of my head.
Q. If the jury wanted to know how much time you'd spent working on this matter and forming the opinions that you formed for this matter, what's your best estimate?

MR. GUERRA: Object to the form.

A. Well, I'd have to look it up.
Q. Is that something you have looked at in preparation for your deposition today?
A. No.
Q. What did you do to prepare for your deposition today?
A. Sorry.
I read through my report and my declaration from 2023 and my report from 2025.
Sorry, I'm a little hoarse. So if I start and stop again, you'll know why.
I met with counsel, Mr. Guerra. I looked at Dr. Lustig's report. I looked at the data. I think that's about it.
Q. About how much time, total, did you spend

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to Sweet Home Alabama?
A. Yes.
Q. Okay. And you see there, there is a stanza if we go down to the next page, so page 986 of the PDF, there is a stanza there that says:
"Now Muscle Shoals has got the Swampers."
Are you there?
A. Yes.
Q. And if you look at the right-hand side, you compared that to the LyricFind lyrics and there's a stanza there that says:
"Now Muscle Shoals has got the Swampers."
And follows from there, right?
A. Yes.
MS. MEHTA: Okay. Now I'm going to have marked as Exhibit No. 7, tab 32, please.
THE REMOTE TECH: Stand by.
(Whereupon, Plaintiffs_0000009754 was marked as Leonard Exhibit 7, for identification, as of this date.)
MS. MEHTA: Let me know once you've had a chance to open Exhibit 7.
THE WITNESS: It says Leonard 7 already

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exists.
MS. MEHTA: I think that was the wrong Leonard 7. So I think if you open this one, it will replace over it.
THE WITNESS: I thought I had erased it.
MS. MEHTA: Got it?
THE WITNESS: Not yet.
MS. MEHTA: Okay.
I couldn't hear you, but I think you said okay.
THE WITNESS: Okay.
BY MS. MEHTA:
Q. Great. So first thing I'll do is, I'll have you look at the top of this page of Exhibit 7, there's a number that says Plaintiffs and then it has a bunch of zeros 9754, do you see that?
A. I don't see 0794. Hold on, I'm probably not looking -- is this Sweet Home Alabama, Eu 511375?
Q. It is. And I'm actually having -- I'm asking you to look at the Bates number, the production number for that document, and it's --
A. It hadn't shown up. I got it 975.
Q. Great. And then if you just quickly flip back to the report where we were just looking, and you had

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the comparison of the LyricFind lyrics, you'll see that the deposit copy that you compared for Sweet Home Alabama was Plaintiffs, a bunch of zeros and then 9754. Do you see that?
A. Not yet. Not yet.
Q. Go ahead, take your time. That would be in the Leonard 3, at page 985 that we were just looking at.
You there?
A. No, I'm still looking, sorry.
Q. Yeah, okay. This is your opening report, Leonard 3, right where we with looking at that New Muscle Shoals, just the page right before that.
A. Paragraph 73, correct?
Q. No, no. Not a paragraph. The chart that we were looking at on page 985 where we were looking at the lyrics for the comparison for Sweet Home Alabama, and the paragraph New Muscle Shoals.
A. Leonard 6?
Q. Leonard 3?
A. 3 and 7, right?
Q. Exactly. And in Leonard 3 where you did the comparison of the deposit copy and the LyricFind lyrics for Sweet Home Alabama, you looked at Plaintiffs_00000009754, right?
A. Okay.

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Q. Do you see that there on Leonard 3?
A. I think so. So I see the comparison of Sweet Home Alabama, by Ronnie Van Zant, et cetera, a deposit copy and Lyric Find and then the deposit copy, right?
Q. Great. And what I'm asking you is if you just look at that comparison, at the top where it has Sweet Home Alabama and then Ronnie Van Zant and the other song writers, it has a number Plaintiffs and then all those zeros 9754. Do you see that?
A. I do.
Q. Okay. And that's the same number as appears on Leonard 7, the deposit copy, sheet music for Sweet Home Alabama, right?
A. Okay.
Q. Do you see that? Was that a yes?
A. Yes. Yes.
Q. Thank you. So now I'll have you look at that deposit copy that you analyzed and that you had excerpted in Exhibit 3 and could you point me to where there is the New Muscle Shoals stanza?
A. Is it one page? I thought it was two pages.
Q. This is the Exhibit. It's just that.
A. The exhibit is one page?
Q. This is the one page of that document, yes.
One PDF page, it looks like two pages from a book that

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have been -- or two paper pages that are side by side, so I want to be clear about that. But there's not a second page of the PDF.
A. Okay, yes. And we don't have a "Muscle Shoals" there.
Q. So when you looked at the deposit copy in Exhibit 3 and you had that New Muscle Shoals language, that didn't actually come from this deposit copy, did it?
A. Apparently not.
Q. Do you know where it came from?
Sorry, we didn't get a verbal response.
A. I said I don't remember.
Q. Do you know whether or not the actual deposit copy for Sweet Home Alabama for the work that's at issue in this case has the language that's in LyricFind or not?
MR. GUERRA: Objection to form.
A. Say it again?
Q. That was a bad question. I'll ask the question differently.
We're looking at a deposit copy for Sweet Home Alabama that doesn't have the whole stanza that was in the LyricFind lyrics, right?
A. Yeah.

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Q. Okay. For the 499 works-in-suit, did you go through and analyze whether the LyricFind lyrics actually match the deposit copy for each of those works-in-suit that was deposited with the copyright office?
A. Yes.
MR. GUERRA: Objection to form.
Q. You're said you did that for all 499 works-in-suit?
A. Oh, sorry, sorry. I misunderstood you. Hold on a second, okay. I thought you were asking me about the deposit copies.
Q. I am. I'm asking for each of the works-in-suit for this case --
A. All right. So hold on, hold on, hold on. I'm closing ten windows.
Q. Totally fine. Let me know when you're ready.
Okay, are you ready? I can't hear you. Sorry we still couldn't hear you.
A. No.
Q. There we go.
I think you said okay, but you cut out again.
A. Really, gee.
Q. Now you're back.
A. Okay. I am plugged in, hardwired.

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Q. You're fine now. You're fine now. The question I asked is for each of the 499 works-in-suit, did you look at the deposit copy that was submitted to the copyright office?
MR. GUERRA: Objection to form.
A. I didn't know there were 499 deposit copies. I looked at the deposit copies that I received.
Q. Okay. My question was about the works-in-suit. You know there are 499 works-in-suit in the case, right?
A. Okay.
Q. Do you have that understanding?
A. Yeah.
Q. Okay. And my question was, did you look at the deposit copies for each of those?
MR. GUERRA: Objection to form.
A. I looked at the deposit copies I had -- I was given by counsel.
Q. And that was 13, right?
A. Correct.
Q. Okay. And we just looked at one, where we saw that the language that you had in your comparison didn't actually match the deposit copy, right?
MR. GUERRA: Objection to form.
A. Right so -- sorry. That's correct.
Q. Now my question is: For the -- what's 499

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minus 13? For the 486 deposit copies for the works that you didn't have access to, you don't know whether or not the LyricFind lyrics reflect what's actually in the deposit copy, correct?
MR. GUERRA: Objection to form.
A. I haven't examined them, yeah.
Q. You -- for the 13 that you did look at, the deposit copy had more than just song lyrics, right? It actually had the composition for the music, correct?
A. Well, some just had the music.
Q. Did you have any deposit -- of the 13 deposit copies that you were given by counsel, did any of them have just lyrics?
A. I don't recall.
Q. You don't recall any that did. Is that fair?
MR. GUERRA: Objection.
A. Yeah, no -- I just don't recall, period.
Q. Okay. Do you know whether deposit copies for musical compositions are ever submitted with just lyrics?
A. I don't know.
Q. In your rebuttal report, you offer some criticisms of Dr. Lustig's methodology, correct?
A. Yes.
Q. And one of the things you do is address

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ACKNOWLEDGMENT

STATE OF NEW YORK)
):ss
COUNTY OF)

I, ROBERT LEONARD, hereby certify that I have read the transcript of my testimony taken under oath in my deposition of the 27th day of February, 2026; that the transcript is a true, complete and correct record of my testimony, and that the answers on the record as given by me are true and correct.

_____
ROBERT LEONARD

Signed and subscribed to before me, this day of , 2026.

_____
Notary Public, State of New York

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CERTIFICATE

STATE OF NEW YORK)
) ss.:
COUNTY OF QUEENS)

I, BROOKE E. PERRY, a Notary Public within and for the State of New York, do hereby certify:

That ROBERT LEONARD, the witness whose deposition is hereinbefore set forth, was duly sworn by me and that such deposition is a true record of the testimony given by such witness.

I further certify that I am not related to any of the 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 27th day of February, 2026.

Brooke E. Perry
BROOKE E. PERRY

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ERRATA SHEET

CASE NAME: CONCORD MUSIC GROUP, INC. V. ANTHROPIC PBC
DATE OF DEPOSITION: February 27, 2026
WITNESS'S NAME: ROBERT LEONARD

PAGE	LINE (S)	CHANGE	REASON

ROBERT LEONARD
SUBSCRIBED AND SWORN TO BEFORE ME
THIS ____ DAY OF _____, 20__.
_____ _____
(NOTARY PUBLIC) MY COMMISSION EXPIRES:

No. 621065

Re: Deposition of **Robert Leonard**, Ph.D.
Date: 2/27/2026
Case: Concord Music Group -v- Anthropic
Return to: transcripts@planetdepos.com

Page	Line	Correction/Change and Reason
13	12	Change “steam” to “scheme”; mistranscription
16	13	Change “extension” to “intention”; mistranscription
29	22	Change “I assume” to “I don’t assume”; mistranscription
50	13	Change “Eight” to “Twenty-eight”; mistranscription
78	23	Change “references” to “reference”; mistranscription
83	5	Change “at the time, we were starting” to “at the time were starting,” clarification
91	17	Change “over” to “on”; mistranscription
93	1	Change “ou” to “you”; mistranscription
100	21	Change “shared semantic meaning” to “don’t share semantic meaning”; clarification
106	24	Change “finely” to “finally”; mistranscription
113	23-25	Add “ before “Did somebody” and ” after “no.”; clarification
117	18	Change “get back down that” to “get back to you on that”; mistranscription
120	2-3	Move “ from before “Message” to before “I hope”; clarification
152	3-4	Change “that would” to “or that could”; mistranscription
163	5	Change “than my” to “than what’s in my”; clarification
163	10	Change “Maintenance” to “Plaintiffs”; mistranscription
176	7	Change “perotic” to “parodic”; mistranscription
176	8	Change “perotic” to “parodic”; mistranscription

4/10/2026
(Date)

Robert Leonard
(Signature)

No. 621065

Re: Deposition of **Robert Leonard**
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ACKNOWLEDGMENT OF DEPONENT

I, Robert Leonard, 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.

4/10/2026 Robert Leonard

(Date) (Signature)