EXHIBIT 128

(FILED UNDER SEAL)

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

CONCORD MUSIC GROUP, INC., ET AL.,
Plaintiffs,
v.
ANTHROPIC PBC,
Defendant.
Case Number 5:24-cv-03811-EKL SVK

HIGHLY CONFIDENTIAL--ATTORNEYS' EYES ONLY
VIDEOCONFERENCED and VIDEO-RECORDED
30(b)(1) DEPOSITION of
Anthropic PBC, by and through its Designated Representative,
VINAY RAO, Ph.D.
San Francisco, California 94111
Friday, November 7, 2025

Reported Stenographically by:
MARY J. GOFF
CSR No. 13427
WA CSR No. 21030779
Job No. 606055(30b1)
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HIGHLY CONFIDENTIAL--ATTORNEYS' EYES ONLY
VIDEOCONFERENCED and VIDEO-RECORDED DEPOSITION of VINAY RAO, Ph.D., Volume I, taken on behalf of Plaintiff Publishers, Oppenheim + Zebrak, LLP, at WilmerHale, 50 California Street, Suite 3600, San Francisco, California 94111, beginning at 3:07 a.m. and ending at 8:57 p.m., on Friday, November 7, 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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BY: TAYLOR GOOCH
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ALSO PRESENT: Ian Chen, In-house counsel Anthropic
Ellen Stephano, Esquire, WilmerHale (remote Boston)
Videographer: Philip Astor

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THE VIDEOGRAPHER: Here begins Media Number 1 in the videotaped deposition of Vinay Rao, individual, in the matter of Concord Music Group, versus 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 7, 2025. The time on the video monitor is 15:07 (3:07 p.m.)

The videographer today is Phillip Astor, representing Planet Depos. All members of this -- this video deposition is taking place at Wilmer Cutler Pickering Hale and Dorr LLP, San Francisco, California.

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

ATTORNEY MILLER: Corey Miller, from Oppenheim + Zebrak LLP, for the Plaintiff Music Publishers.

Also here with me today is Tim Chung.

ATTORNEY GOOCH: Taylor Gooch with WilmerHale on behalf of Anthropic.

Also with me here today is my colleague, Ms. Ellen Stephano, in-house counsel for Anthropic, and the witness.

THE VIDEOGRAPHER: The court reporter

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today is 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.

VINAY, RAO, Ph.D.,

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 MILLER:

Q Good afternoon, Dr. Rao.

A Good afternoon.

Q Do you understand that you've just taken an oath to tell the truth?

A Yes.

Q Is there any reason why you cannot give full, complete, and accurate testimony in accordance with that oath today?

A No.

Q All right.

ATTORNEY MILLER: Tab 2, please.

Q (BY ATTORNEY MILLER) In the Zoom you'll see what I have marked as Exhibit 95.

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states that:

[redacted]

Do you see that?

A Yes.

[redacted]

ATTORNEY GOOCH: Objection, form.

A I would frame it more as we were dedicated to building a really, really good copyright respecting product. So as a part of the planning for the following year, we were putting -- improving our copyright protections as one of the priorities for 2024.

[redacted]

ATTORNEY GOOCH: Objection, asked and answered.

A Let me say that again. That's not what I said.

When you build an engineering system, you -- after the first iteration, you then go back

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and then improve the engineering system.

And like I had said, even the first version of -- or the first iteration of CopyFairy to CCS, it was a significant engineering improvement.

I mean, just to sort of reiterate what an amazing product engineering system CCS is, that it

[redacted]

That's the same with the prompt classifier. The prompt classifier alone costs about

[redacted]

So it's a heavily invest -- well-invested system. And for anything that work at scale, the -- the engineering work is substantial.

And what this says is it isn't just the maintenance work that's being done, it is continuing to improve that.

Q But you were the one -- it's your words

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[redacted]

ATTORNEY GOOCH: Objection, asked and answered twice now.

A Like I said, the engineering systems, we knew it would continue to increase, and we will continue to improve.

This really should be seen as an investment and -- into continuing to improve how we do copyright detection.

Q (BY ATTORNEY MILLER) All right. Moving down. Stay on page 1, but we're going to look at the second -- the bottom part of page 1 now.

A The bottom part of page 1. Okay.

Q Go up a little bit more. That's fine.

A Um-hum.

Q So you -- do you see in the middle of page 1, you state:

We are requesting [redacted] new heads, correct?

A Yes.

Q And the current headcount of trust and safety was [redacted] correct?

A Yes.

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Q So you were requesting to double the size of the --

A Yes.

Q -- trust and safety group?

How many additional headcounts-- withdrawn.

How much additional headcount was approved at this point?

A I don't remember exactly. What I will say, though, is the team grew a lot.

Q Do you see in the -- there's an "HC Summary" at the bottom of this page, correct?

A Yeah.

Q And "HC" means "Headcount"?

A Yes.

Q Under -- and so the current is [redacted]

So the first one is "head of T&S."

That's you, right?

A Yes.

Q And then "Policy and Enforcement" is [redacted]

A Yes.

Q What do policy and enforcement personnel do?

A So when -- when we decide that a certain kind of behavior is -- is not acceptable on

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ATTORNEY GOOCH: Great. No questions.
ATTORNEY MILLER: All right. We can off the record then.
A Thank you.
THE VIDEOGRAPHER: All right. This marks the deposition of Vinay Rao as an individual. We are going off the record at 20:57 p.m.

(TIME NOTED: 8:57 p.m.)

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I, VINAY RAO, Ph.D., do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.
EXECUTED this_____ day of_____,
20____, at_____,_____.
(City) (State)

_____
VINAY RAO, Ph.D., 30(b)(1)

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I, MARY J. GOFF, CSR No. 13427, Certified Shorthand Reporter of the State of California, certify;
That the foregoing proceedings were taken before me at the time and place herein set forth, at which time the witness declared under penalty of perjury; that the testimony of the witness and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed under my direction and supervision; that the foregoing is a full, true, and correct transcript of my shorthand notes so taken and of the testimony so given;
That before completion of the deposition, review of the transcript () was (xx) was not requested: ( ) that the witness has failed or refused to approve the transcript.
I further certify that I am not financially interested in the action, and I am not a relative or employee of any attorney of the parties, nor of any of the parties.
I declare under penalty of perjury under the laws of California that the foregoing is true and correct, dated this 13th day of November, 2025.

Mary J. Goff
MARY J. GOFF

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ERRATA SHEET
PLANET DEPOS
451 Hungerford Drive, Suite 400
Rockville, Maryland 20850
888-433-3767
CASE: Concord v. Anthropic

PAGE	LINE	FROM	TO

_____
VINAY RAO, Ph.D., 30(b)(1)
Subscribed and sworn to before me
this_____ day of_____, 2025.
_____
Notary Public

ERRATA TO THE DEPOSITION TRANSCRIPT OF
Vinay Rao (30(b)(1))
TAKEN ON **November 7, 2025**

I have reviewed the transcript of my 30(b)(1) testimony of **November 7, 2025**, and hereby make the following changes in form and/or substance:

PAGE	LINE(S)	CHANGE	REASON FOR CHANGE
14	8	"uncalled badness" to "uncaught badness"	Transcription error
14	17	"not in the time" to "not at the time"	Transcription error
27	18	"multimodel" to "multimodal"	Transcription error
49	4	"2021" to "21"	Transcription error
96	10	[redacted]	Transcription error
96	11	[redacted]	Transcription error
140	15	"B[harm]" to "P(Harm)"	Transcription error
140	16	"B[adult], B[child], B[hate]" to "P(adult), P(child), P(hate)"	Transcription error
140	17	"B[harm]" to "P(Harm)"	Transcription error
140	18	"B[harm]" to "P(Harm)"	Transcription error

I, **VINAY RAO**, read the foregoing deposition and hereby state that the foregoing is true and correct, except as noted herein.

Vinay Rao
Vinay Rao

12/10/2025
Date