EXHIBIT 137

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

CONCORD MUSIC GROUP, INC., ET AL, * Plaintiffs, * VS. * ANTHROPIC PBC, * Defendant. * CIVIL ACTION * NO.: 5:24-cv-03811-EKL * SVK

****

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

ORAL AND VIDEOTAPED DEPOSITION OF

COLIN STOKES

MARCH 6TH, 2026

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ORAL AND VIDEOTAPED DEPOSITION OF COLIN STOKES, produced as a witness at the instance of the PLAINTIFFS, and duly sworn, was taken in the above-styled and numbered cause on the 6th of March, 2026, from 9:03 a.m. to 3:22 p.m., via Zoom, before Tammy Staggs, CSR in and for the State of Texas, reported by machine shorthand, at the Springhill Suites by Marriott Denton, 1434 Centre Place Dr, Denton, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the

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record or attached hereto. That the deposition shall be read and signed under penalties of perjury. That the deposition shall be read and signed before any notary public.

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A P P E A R A N C E S

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ALSO PRESENT:
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Karl Johnston (Via Zoom) - In house counsel for Anthropic

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PROCEEDINGS

THE VIDEOGRAPHER: We are now on the record. Today's date is March 6th, 2026. The current time is 9:03 a.m. This is the video deposition of Colin Stokes.

Will counsel please announce themselves for the record.

MR. KING: Yes. My name is Jonathan King. I'm with Cowan, Liebowitz & Latman. I am -- we are one of the firms representing the Plaintiff Music Publishers in this case.

MR. GRUBOW: This is Jared Grubow with Wilmer Cutler Pickering Hale and Dorr on behalf of Anthropic PBC. I'm joined on the Zoom by, I believe, my colleagues Becky Maz and Carl Johnston, in-house at Anthropic.

THE VIDEOGRAPHER: Will the court reporter please swear in the witness.

COLIN STOKES,

having been first duly sworn, testified as follows:

EXAMINATION

BY MR. KING:

Q. Good morning, Mr. Stokes.

A. Good morning.

Q. As we just met a moment ago, my name is John King. I'm going to be taking your deposition today. Have you ever had your deposition taken before?

A. I haven't.

Q. Okay. I'm sure your counsel has given you a heads-up, but let me just lay out some of the ground rules.

I will be asking you questions, and you will be answering them under oath. If you don't understand my question, let me know and I'll try to rephrase it.

I may ask you about some circumstances or facts you may not remember. Even if they relate to the preparation of your expert reports in this matter, I don't want you to guess or speculate. By the same token, I'm entitled to your best recollection of the facts and circumstances I'll ask you about.

From time to time, your counsel Mr. Grubow may assert objections. In the vast majority of cases, those objections are solely for the purposes for preserving certain positions on the record. So should this transcript ever be used at trial, it preserves Mr. Grubow's ability to say: I object to that question for this, that, or the other reason. But notwithstanding those objections, you're required to answer my question.

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The only exception to that is if I invade a privilege, then we can talk about it. And that's the sole circumstance in which he would be permitted to instruct you not to answer. Otherwise, you need to answer my questions.

And perhaps the most important ground rule is human beings talk over each other, but we have a court reporter here. So I'll try to not step on your toes; and, likewise, wait until I finish my question, even if you know where it's going, until you answer.

Is all that understood?

A. Understood.

Q. Okay. So my understanding is that your academic background is in various aspects of music. Right?

A. Correct.

Q. So you have a degree from the Eastman School of Music in Rochester, right?

A. Correct.

Q. And you got a BA in music performance?

A. A BM, Bachelor of Music.

Q. And -- and was this specifically performance as a cellist?

A. It was performance as a cellist.

Q. Okay. You also have a degree from Juilliard

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MR. GRUBOW: Object to the form.
A. I'm happy to take your word for that. But the -- the important point I'm making is that it's important to contextualize how lyrics are used in music, which was a main assignment, a main thing I was asked to opine on in this case.
To contextualize how lyrics are -- are used in music, we have to get a baseline understanding of what the components of a musical composition are. And that's exactly why I discuss music without lyrics. It has nothing to do whether all the works-in-suit use lyrics or not. It's to gain a baseline understanding of the -- of the language of music, which I do in this -- let's see -- which I offer in this Section 3 of my first report.
Q. (BY MR. KING) Do you understand it to be a contested -- do you understand the Plaintiffs ever to have alleged in this case that lyrics are the only portions of a musical compensation, that there are no other musical elements?
MR. GRUBOW: Object to the form.
A. I'm happy to return to paragraph 10 where I detail my understanding of the allegations as they pertain to -- to my assignment in this case.
My understanding is that those allegations

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are that Plaintiffs allege Defendant's infringement of copy written -- copyrighted works in the development and use of its genAI products. And they allege that the Defendant -- what was it -- copied and disseminated Plaintiffs' works, including lyrics.
Q. (BY MR. KING) Let me ask you something. You -- don't you think that your average lay listener understands that music has different components? It might have lyrics. It might have melodies or rhythms. People generally understand that, correct?
MR. GRUBOW: Objection to the form.
A. In my work as an adjunct instructor at Dallas College, I teach music appreciation. The -- which is a require -- acquired -- required common core -- I don't know if I have the exact correct terms for Texas education system, but it's a required course at that college.
And one of the things we cover with these students are the basic elements of a music composition. And I can tell from many of my students, they -- they haven't considered these specific components of musical composition before. So I would say the answer to your question is no, not always.
Q. (BY MR. KING) Do you think your average lay listener understands that there are some songs that have

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lyrics and some that don't?
MR. GRUBOW: Objection to the form.
A. I believe an average listener listening to a song would be able to tell if there are lyrics or not.
Q. (BY MR. KING) Right. And an average listener understands that lyrics are words often sung by a singer and that there's other music besides what they're hearing vocalized by music, right?
MR. GRUBOW: Objection.
Q. (BY MR. KING) Modern popular music as an example.
MR. GRUBOW: Objection to the form.
A. Again, I believe, yes, insofar as an average listener can differentiate between a human voice and what's not a human voice. But I don't think an average listener necessarily has a knowledge of -- of how lyrics are set in music and the important emotional and narrative value that lyrics derive from their musical setting.
Q. (BY MR. KING) Let's look at paragraph 17A of your report, Stokes Exhibit Number 3. This falls under a heading which is the summary of the conclusions you reach in this report. Right? Let's look at the second sentence of paragraph 17A.
You say, (as read): Lyrics can be a

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meaningful part of a composition but derive much of their value and expression from their setting within the rest of the musical composition and take on particular meaning when paired with melody, harmony, instrumentation, and other compositional elements.
So the first part of that opinion is that lyrics can be a meaningful part of a composition. What do you mean by "meaningful"?
A. Of course lyrics can be a meaningful part of a composition. If -- if text didn't have meaning, we wouldn't be able to have this conversation. So I'm saying that while lyrics can be a meaningful part, they derive much of their narrative and emotional value from the particular ways they're paired with these musical elements that I lay out. And I -- I -- I believe I give many examples of -- of how this works --
Q. We'll get to that.
A. -- in Section 3. I'm still answering.
For example, the -- the -- the perceived valence of specific types of chords. Minor -- quiet minor chords -- so I'm talking about dynamics and harmony here. Quiet minor chords can be -- are perceived as -- as sad or vulnerable. Whereas loud minor chords can be perceived as -- as angry.
Then the same -- same thing goes for --

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record at 2:53 p.m.
Q. (BY MR. KING) If I can refer you back to your original expert report, Stokes Exhibit Number 3. If you'll look at paragraph 90.
A. Sure. I would also like to make a correction to something I said just before break. Is that all right?
Q. Yeah, you can do that.
A. If we look at Footnotes 50 through 53 of the reply report, I'm, in fact, citing to seven examples in my response to the Dennis report in these three paragraphs. I think the record before showed that I was citing to three.
Q. All right. Now, if you can turn to paragraph 9 of your expert report -- the original one. Sorry 90.
A. Ninety.
Q. After disc- -- describing the reasons why LLMs use large and heterogenous dataset you say, (as read): This, however, does not mean that a general-purpose LLM would need to specifically be trained on the text of song lyrics to understand and generate lyric-like text. Other data exists that would allow a general-purpose model to understand various genres and styles without access to lyric data.
So would Claude be as useful to you as a

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songwriter if it had not trained on lyrics?
MR. GRUBOW: Objection to the form.
A. My understanding is that LLMs are able to generalize to domain adjacent data. So my understanding -- and I -- I cite a few sources to support this. But my understanding is even without training on lyrics specifically, LLMs can -- can generalize to -- to domain adjacent. So LLMs could use other sources, for example, reviews of songs, discussions of song lyrics, analysis of lyrics to -- to generalize without having actually trained on lyrics.
Q. (BY MR. KING) And your citations for -- in support of that principle are deposition testimony of Anthropic employees or executives, right?
A. Two of the citations I use in relation to this point are the Mann deposition and the Caplin deposition, but those are not the only sources I use to support this argument.
Q. Well, you don't cite any -- there's only one footnote in paragraph 90 where you make the point that LLMs would need to train on lyrics to reproduce lyric-like content. You just cite to the two -- the Mann and the Caplin deposition. You don't cite to any other source for that particular proposition, do you?
MR. GRUBOW: Objection to the form.

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A. So in this particular closing paragraph to this -- this section -- what is it, IV C, I believe, I cite to these two depositions. If you look back at Footnote 248, I cite this in paragraph 86, the article Verifying the Generalization of Deep Learning to Out-of-Distribution Domains written by Guy Amir, et al. I specifically highlight the quote, (as read): One critical limitation lies in the well-known challenged faced by deep dural -- deep neural networks when attempting to generalize to novel input domains. This refers to their tendency to exhibit suboptimal performance on inputs significantly different from those encountered during training.
And then I --
Q. (BY MR. KING) Can you explain to me --
A. -- I later argue --
Q. Sorry.
A. -- that these -- these -- this term "significantly different" does not apply to lyrics as there are -- there is plenty of training data available that is domain similar enough to lyrics that LLMs would be able to generalize to lyrics without directly training on them.
Q. And when you -- when you say that they are domain adjacent or domain similar, you mean that there

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are other forms of texts that give you enough infor- -- or give LLM enough information about lyrics that they would -- the LLM would not need to train on lyrics themselves to do what it does in terms of reproducing lyric-like content -- not reproducing -- producing lyric-like outputs?
MR. GRUBOW: Objection to the form.
A. My finding in this section is that a general purpose LLM that is not specifically trained on lyrics would be able to generalize -- to generate lyric-like texts.
Q. (BY MR. KING) Okay. So then my follow-up question to that is: Had Claude not -- our allegation is that Claude trained on lots of our clients' lyrics. Had Claude not done that, it could still do just as good a job at producing lyric-like content?
MR. GRUBOW: Objection to the form.
A. This -- this is a hypothetical situation, again; and I have not connected specific training inputs with specific training outputs. But my understanding of LLMs is that if they're trained on similar data that is not significantly different from some desired output, that they would be able to generalize to the output.
Q. (BY MR. KING) Well, Claude is a general-purpose LLM, correct?

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A. Claude is an LLM, yes.
Q. Right. And you say here that, (as read): A general-purpose LLM would not need to specifically be trained on the types of song lyrics to understand and generate lyric-like texts.
So given that observation, Claude would be just as useful to you as a composer had it not trained on lyrics as it is in its current iteration where it has trained on lyrics?
MR. GRUBOW: Objection to the form.
A. I don't believe in this paragraph 90 I'm opining on usefulness. I know I do earlier. In this case, what I'm -- what I'm arguing in this sentence you're pointing to is the general-purpose LLMs would not need to be specifically trained on the text of song lyrics to understand and generate the lyric-like text.
Q. (BY MR. KING) Well, I guess that would then carry over to what's -- to your rely report where you comment on some of the opinions by Dr. Zhao, correct?
MR. KING: Z-H-A-O.
A. I do -- as part of my reply report, I comment on or I rely to some opinions of Dr. Zhao.
Q. (BY MR. KING) And by the way, in your -- in your opening report, you also cited to some articles in support of your opinion by Dr. Zhao, right?

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A. I would be happy to --
MR. GRUBOW: Objection to the form. I think that mischaracterizes some of the citations.
Q. (BY MR. KING) Okay. We don't need to spend time on it.
So in your reply report at paragraphs 6 and 7, you get to some of the positions that Dr. Zhao took. He says, for example, that -- let me find the exact quote. (As read): Dr. Zhao offers the opinion that because lyrics are, quote, stylistically rich and idiosyncratic, they're valuable as training data.
Do you agree or disagree with that characterization -- that opinion, I should say?
A. Sure. As -- as I state, Dr. Zhao makes these -- my understanding is that Dr. Zhao is a computer scientist. I believe he's making these statements without specific expertise in how lyrics are used in musical composition.
Beyond that, I lay out in this section how -- how lyrics can be thought of as poetic and poetry can be used as -- as lyrical material. So in that sense, lyrics and poetry can share certain properties.
But if you look at paragraph 7, I go on to say not all lyrics are commonly thought of as poetry. Lyrics can often consist of simply commonplace words and

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be repetitive in nature and use vernacular idioms rather than enriched or literary language from poetry.
Q. But mister --
A. So my -- my argument is that lyrics can take many forms. And as I -- as I said before, I believe lyrics are similar enough to many other available sources of data that LLMs would be able to generalize to create lyric-like content.
Q. Right. And I'm not -- I'm asking you about Dr. Zhao's opinion as a computer scientist. He says, as you quote in the first sentence of paragraph 5, that, (as read): The stylistically rich and idiosyncratic nature of lyrics makes then particularly valuable as training data for general-purpose LLMs.
Do you dispute that opinion? Yes or no?
MR. GRUBOW: Objection to the form.
A. I'm arguing that Dr. Zhao fails to take into consideration the interplay between poems and lyrics.
Q. (BY MR. KING) He's not talking about -- my question has absolutely nothing to do with poetry.
Do you believe that -- do you agree or disagree that lyrics are stylistically rich and idiosyncratic; and because of that quality, they are particularly valuable as training data? We're not talking about poetry. We're just talking about whether

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lyrics are valuable as training data because they're stylistically rich and idiosyncratic.
MR. GRUBOW: Objection to the form.
A. I believe Dr. Zhao is discussing whether lyrics contain a specific or certain uniqueness that means they're required as part of a heterogenous dataset.
And I show in the following paragraphs that lyrics can share properties with poetry, and poetry can be used as lyrics. And that poetry can also be more vernacular and consist of repeated words and phrases, especially in pop music -- in popular music, which includes many of the works-in-suit.
I -- I show examples of this, for example, Joe Cocker's work-in-suit "You Are So Beautiful," which repeats the same simple phrase over and over and yet gains -- gains emotional meaning from the changes in dynamic and vocal timbre.
Q. (BY MR. KING) Okay. We'll get --
A. I also go on to say that lyrics can be made -- as I discuss in my first report too, that -- that lyrics can be made up of nonsensical words where the full expression of the composer comes from the underlying musical elements. So the point of this is that regarding -- regardless of whether -- what form these

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in this -- in these reports that -- that meaning and memorability of this invented word "Sussudio" is greatly dependent on the meaning it derives from its setting within the other elements of a musical composition. I would argue the same for the many other examples of non-semantic -- or non-sensor, non-lexical words used in lyrical writing.

Q. (BY MR. KING) If you'll go to paragraph 13 of your reply report, which is Stokes Exhibit 10, I believe, you also comment on another opinion that Dr. Zhao offers. And you not -- and you quote him in paragraph 13 as saying that, (as read): Anthropic uses lyrics in training for the ultimate goal of building a model that can do a variety of things.

Right? Including responding to prompts about music lyrics, reproducing lyrics, creating new lyrics, or answering questions about those lyrics? Right?

A. Yes, I quote him in this paragraph.

Q. And then you comment on that in paragraph 14 by noting that, (as read): However, regardless of the manner in which music and lyrics are combined, composers primarily compose music to communicate their ideas and emotions to the audience.

In other words, they're not composing

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music to answer questions or analyze lyrics, for example, right?

A. Correct. So I'm -- I'm arguing that the primary -- the primary use for the composition and perhaps performance of music is a communicative one.

Q. But when a composer uses Claude to create new lyrics, presumably that composer is using it to create lyrics that will communicate ideas and emotions just as if they themselves had written the lyrics, right?

MR. GRUBOW: Objection to the form.

A. So my understanding is that Dr. Zhao is suggesting that these uses include many other things, including reproducing lyrics or answering questions about -- about lyrics. What I'm arguing here is that -- or my opinion here is that the primary goal of composition is, as I say, sharing emotional experiences, resonating emotionally, et cetera. It's about musical or narrative communication.

Q. (BY MR. KING) Right. And when you have used Generative AI to create lyrics for -- or to assist in the creation of lyrics for your pieces, it's for the same purpose, right, to communicate ideas and emotions?

MR. GRUBOW: Objection to the form.

A. I -- I would absolutely agree with you that I use genAI tools as an expansion and augmentation of my

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creative practice.

Q. (BY MR. KING) Right. So that would be one instance in which the use of Generative AI mirrors very much the, sort of, let's say, non-IA assisted purposes of musical composition to communicate ideas and emotions, right?

MR. GRUBOW: Objection to the form.

A. I would say that I'm disagreeing with Dr. Zhao's contention that this broad list of use cases mirror the use -- the primary reason behind composing music, which is to communicate an artist's ideas and emotions to their audiences.

This is backed up -- I back this up with studies from evolutionary musicology that show -- I mean, I can quote. (As read): Ethnomusicologists have documented an abundance of social functions for music. It expresses emotion, induces pleasure, accompanies dance, validates rituals and institutions.

This quote goes on, (as read): Music can be a vehicle for communication, sometimes with exquisite precision.

Earlier I pull from the book by Steven Brown and others called An Introduction to Evolutionary Musicology in which I summarize as saying, (as read): From an evolutionary musicology perspective, music is a

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biologically grounded system of acoustic communication, suggesting that its primary function is relational and not as Dr. Zhao reports for reproducing lyrics or answering questions about those lyrics or otherwise analyzing lyrics.

Q. (BY MR. KING) Well, in this whole opinion about, sort of, the purposes for creating or using lyrics, you're offering your opinion on that phenomenon from the perspective of composer and artists, right, not music consumers necessarily?

A. I'm so sorry. Would you mind restating?

Q. My question was so good it got us standing up.

MR. KING: Are you able to get the -- I'm close to being done. Yeah, can you hear my question?

THE VIDEOGRAPHER: Yeah.

THE WITNESS: Can you hear my answers?

THE VIDEOGRAPHER: Yeah.

THE WITNESS: Okay.

Q. (BY MR. KING) Let me ask the question again.

A. Okay. Thanks.

Q. You offer an opinion about the purpose of music, the purpose of lyrics. Most of your opinion is offering a view on those purposes to communicate emotion from the perspective of the composer, the artist who creates the music, right?

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I further certify that I am neither counsel for, related to, nor employed by any of the parties or attorneys in the action in which this proceeding was taken, and further that I am not financially or otherwise interested in the outcome of the action.

Certified to by me this _____ day of _____, 20____.



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COUNTY OF _____)
STATE OF TEXAS)

I hereby certify that the witness was notified on _____ that the witness has 30 days or (____ days per agreement of counsel) after being notified by the officer that the transcript is available for review by the witness and if there are changes in the form or substance to be made, then the witness shall sign a statement reciting such changes and the reasons given by the witness for making them;

That the witness' signature was/was not returned as of _____, 20____.

Subscribed and sworn to on this, the _____ day of _____, 20____.



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ERRATA TO THE DEPOSITION TRANSCRIPT OF
COLIN STOKES
TAKEN ON **March 6, 2026**

I have reviewed the transcript of my testimony of **March 6, 2026**, and hereby make the following changes in form and/or substance:

PAGE	LINE(S)	CHANGE	REASON FOR CHANGE
13	9	"Petras Vysniauskas" to "Petros Klampanis"	Transcription error
18	16	"my salary—role" to "my salaried role"	Transcription error
57	16	"to" to "two"	Transcription error
104	15	"psychologists commenting" to "psychologists—commenting"	Correcting punctuation
106	16	"constriction" to "contradiction"	Transcription error
106	17	"always" to "also"	Transcription error
123	1	"journal" to "report"	Clarifying record
127	2	"instrumentation texture" to "instrumentation – texture"	Correcting punctuation
129	23	"resinated" to "resonated"	Transcription error
136	9	"resinate" to "resonate"	Transcription error
138	16	"Chapter" to "paragraph"	Clarifying record
139	19	"out" to "without"	Transcription error
140	20	"DOS" to "DAWs"	Transcription error
140	20-21	"decoding language maximum speed" to "the coding language MaxMSP"	Transcription error
142	4	"mark" to "marked"	Transcription error
157	3	"banned" to "panned"	Transcription error
157	4	"psychologies" to "technologies"	Transcription error
157	13	"Seminole" to "seminal"	Transcription error
165	8	"corporation" to "chord progressions"	Transcription error

ERRATA TO THE DEPOSITION TRANSCRIPT OF
COLIN STOKES
TAKEN ON **March 6, 2026**

I have reviewed the transcript of my testimony of **March 6, 2026**, and hereby make the following changes in form and/or substance:

PAGE	LINE(S)	CHANGE	REASON FOR CHANGE
206	8	"with" to "as"	Transcription error
206	10	"transformable" to "transferrable"	Transcription error
209	5	"though-starter" to "thought-starter"	Transcription error
212	12	"though-starter" to "thought-starter"	Transcription error
215	3	"though-starter" to "thought-starter"	Transcription error
216	3	"though-starter" to "thought-starter"	Transcription error
216	12	"though-starter" to "thought-starter"	Transcription error
218	16	"Caplin" to "Kaplan"	Transcription error
221	22	"rely" to "reply"	Transcription error
222	25	"simply" to "simple"	Transcription error

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



3/31/2026

Colin Stokes Date