EXHIBIT 138

(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. 5:24-cv-03811-EKL
v. :
ANTHROPIC PBC, : Defendant. :
- - - - - - - - - - - - - x

Video-recorded Deposition of
ANTHROPIC PBC
By and Through Its Designated Representative
THOMAS TURVEY
New York, New York
Wednesday, November 5, 2025
9:13 A.M.

HIGHLY CONFIDENTIAL
ATTORNEYS' EYES ONLY

Pages: 1 - 135
Reported By: Anita M. Trombetta, RMR, CRR,
California CSR No. 14647

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Videotaped deposition of ANTHROPIC PBC, by and through its designated representative, THOMAS TURVEY, held at the offices of:

Wilmer Cutler Pickering Hale and Dorr LLP
7 World Trade Center
250 Greenwich Street
45th Floor
New York, NY 10007
212.230.8800

Pursuant to notice, before Anita M. Trombetta, a Certified Shorthand Reporter in the State of California, RMR, CRR, and Notary Public in and for the State of New York.

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APPEARANCES

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ALSO PRESENT:

TIM KAMAL-GRAYSON, ESQ., ANTHROPIC
ENRIQUE CASAS, Videographer

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----------INSTRUCTION NOT TO ANSWER----------

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PROCEEDINGS

THE VIDEOGRAPHER: Here begins media number 1 in the videotaped deposition of Tom Turvey, in the matter of Concord Music Group vs. Anthropic, in the United States District Court for the Northern District of California, San Jose Division, Case Number 5:24-cv-03811-EKL.

Today's date is November 5th, 2025, and the time on the video monitor is 9:13 A.M. The videographer today is Enrique Casas representing Planet Depos. This video deposition is taking place at 250 Greenwich Street, New York, New York.

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

ATTORNEY MATERA: Bret Matera on behalf of Oppenheim + Zebrak, and the plaintiff publishers, and I'm joined by Jenny Pariser.

ATTORNEY TOMPROS: Louis Tompros of Wilmer Cutler Pickering Hale and Dorr LLP along with, by video my, colleague Christina Luo. And also along in person with Tim Kamal-Grayson from Anthropic, representing Anthropic, and also representing the witness.

THE VIDEOGRAPHER: The court reporter today is Anita Trombetta, representing Planet Depos, and the witness will now be sworn in.

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THOMAS TURVEY, called as a witness, having been first duly sworn by a Notary Public, was examined and testified as follows:

EXAMINATION BY
ATTORNEY MATERA:

Q Good morning, Mr. Turvey.

A Good morning.

Q My name is Bret Matera, and I'll be taking your deposition today. I represent the plaintiff music publishers in this case.

Thank you for taking time out of your schedule to answer my questions. We appreciate it. Today is going proceed in two parts. The first part is your 30(b)(6) deposition. And after that, we will do your 30(b)(1) deposition. And I'll let you know when we switch over.

A Okay.

Q Okay. To begin, can you please state -- start by stating your name for the record?

A My name is Tom Turvey.

Q Okay. Mr. Turvey, have you been deposed before?

A I have.

Q In what matters?

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A Multiple matters. One for Anthropic. Several for a previous employer.

Q Who is that previous employer?

A Google.

Q And what was the matter that you were deposed in for Google?

A Multiple matters. There was a Google Books case, which lasted many years. There was a case regarding Google Play, some patents. There is a third one, which I'm having a foggy memory of that. But there were at least three.

Q Okay. And you've been previously deposed in the Barts v. Anthropic case, that's right?

A Yes, that's right.

Q How many times were you deposed in that case?

A Once.

Q Was the testimony that you gave in the Barts deposition truthful and accurate?

A It was.

Q Okay. So the following may sound familiar to you, but before we get started, I want to go over a few ground rules so today goes quickly and smoothly.

I'm going to ask you a series questions

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A I don't -- I don't -- I'm not sure, to be honest. There could be other uses for evaluation. I've heard of that. And that it creates tokens that enter the model or a model. Those are the two primary uses I'm aware of.

Q What happens to the physical books acquired in connection with Project Panama after you scan them?

A They're pulped. They're -- books are destroyed. They're pulped and they're taken to an environmental company that takes them away and recycles the -- the paper.

Q And Anthropic retains digital copies of those books afterwards?

ATTORNEY TOMPROS: I object. Outside the scope and vague.

A We have a digital copy of each book that we scan, yes.

Q Has Anthropic ever exchanged any of those digital copies of Project Panama books in for new data that it wants to acquire?

ATTORNEY TOMPROS: I object. Outside the scope and vague.

A I'm sorry. One more time?

Q Yeah.

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Has Anthropic ever exchanged any digital copies of books acquired from Project Panama for new data that it wants to acquire?

ATTORNEY TOMPROS: Same objections.

A I think you're asking do we take -- have we ever taken the files of books we've scanned and bartered them for data that we wanted?

Q Sure.

A No.

Q Okay. If we can look back at -- this is now Exhibit 33 on your Zoom screen.

What does ASIN mean here?

A That is a book number that -- invented by Amazon. It's sort of meant to compete with the ISBN standard in the next column, but it's an Amazon-specific number.

Q Okay. And does that number correspond with the author listed next to it?

ATTORNEY TOMPROS: I object. Vague.

A It's meant to correspond to the work, not the author per se.

Q The work?

A Yeah, it's meant to be the same unique identifier as an ISBN, which you see in the next column. It's just a different format of number.

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Q I see.

A Usually there is a number there.

Q You said there is an ISBN number reflected on this document; is that correct?

A Yeah. The ISBN numbers are in that second column there, beginning with zero.

Q Okay. So that is not the ASIN number?

A It -- I'm sorry, it could be -- I don't know -- I don't think I have a complete view of this, but it -- they often -- ASINs often look like ISBNs, and so I don't know if this is -- if this is a full data, then I would assume that that second column is -- is an ASIN and not an ISBN if there is no separate number for the ASIN.

[redacted]

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[redacted]

Q Okay. And does Anthropic digitize all books that it acquires?

ATTORNEY TOMPROS: I object. Vague.

A For print books that we acquire, we do digitize -- I mean, "all" is a -- not quite accurate. But there may be reasons why -- you know, books were sent to us by mistake. There might be books that are damaged. There might be books for whatever reason we have difficulty scanning. But the intent when we purchase books is to digitize them.

Q Okay. Thank you.

I'd like to look quickly --

ATTORNEY MATERA: Well, first, Enrique, can I get a time check, please?

THE VIDEOGRAPHER: We're at 2:21.

ATTORNEY MATERA: Thank you.

I'd like to introduce another exhibit here. This exhibit will be marked as Exhibit

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A I do not know.
Q Including through, potentially, crawling?
ATTORNEY TOMPROS: Same objection.
A I do not know. Not my area.
Q Would it be fair to say that -- strike that.
ATTORNEY MATERA: No more questions.
ATTORNEY TOMPROS: Okay. And that's it for us on the 30(b)(6).
THE VIDEOGRAPHER: Stand by. This marks the end of the deposition of Tom Turvey. We are going off the record. And the time is 12:43 P.M.
(Time Noted: 12:43 P.M.)

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ACKNOWLEDGMENT OF DEPONENT

I, THOMAS TURVEY, 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.

_____ _____
(SIGNATURE) (DATE)

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CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

I, ANITA M. TROMBETTA, RMR, CRR, and Certified California Shorthand Reporter, 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 [or not requested, as appropriate]; 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 notarial seal this 10th day of November, 2025.

My commission expires: 03.21.2027

ANITA M. TROMBETTA