EXHIBIT 184

(FILED UNDER SEAL)

1

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

- - - - - - - - - - - - - - - - x
CONCORD MUSIC GROUP, INC., et al.,
Plaintiffs,
v.
ANTHROPIC PBC,
Defendant.
: Case No. 5:24-cv-03811-EKL-SVK
- - - - - - - - - - - - - - - - x

Highly Confidential
Attorneys' Eyes Only
Pursuant to the Protective Order

Videotaped Deposition of BEN ZHAO, Ph.D.
Chicago, Illinois
Friday, February 20, 2026
9:06 a.m. CST

Job No.: 621063
Pages: 1 - 462
Stenographically Reported By:
Michelle M. Yohler, CSR, RMR, CRR

2

Deposition of BEN ZHAO, Ph.D., held at the location of:

ARNOLD & PORTER
70 West Madison Street, Suite 4200
Chicago, Illinois

Pursuant to notice before Michelle M. Yohler, a Certified Shorthand Reporter, Registered Professional Reporter, Registered Merit Reporter, Certified Realtime Reporter, and a Notary Public, CSR No. 84-4531, in and for the State of Illinois.

3

APPEARANCES

ON BEHALF OF THE PLAINTIFFS:
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(Continued)

4

APPEARANCES CONTINUED

ALSO PRESENT:
Mr. Ian Chen,
In-House Counsel for Anthropic
Mr. James Porter, Videographer

5

E X A M I N A T I O N S

WITNESS		PAGE
BEN ZHAO, PH.D.		
By Ms. Mehta		7
By Mr. Howell		425
By Ms. Mehta		428

E X H I B I T S

EXHIBITS		PAGE
No. 1	Expert Report of Dr. Ben Zhao Dated December 19, 2025	172
No. 2	Rebuttal Expert Report of Dr. Ben Zhao Dated January 23, 2026	172
No. 3	"somesite I used to Crawl: Awareness, Agency and Efficacy in Protecting Content Creators From AI Crawlers."	258
No. 4	Reply Expert Report of Dr. Ben Zhao Dated February 13, 2026	318

6

P R O C E E D I N G S

THE VIDEOGRAPHER: Here begins Media Unit 1 in the video deposition of Ben Zhao in the matter of Concord Music Group Inc., et al., versus Anthropic PBC in the United States District Court, Northern District of California, San Jose Division, Case Number 5:24-cv-03811-EKL-SVK.

Today's date is February 20th, 2026, and the time on the video monitor is 9:06 a.m.

The videographer today is James Porter representing Planet Depos.

This video deposition is taking place at Arnold & Porter in Chicago, Illinois.

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

MS. MEHTA: Good morning. Sonal Mehta from WilmerHale on behalf of Anthropic.

MR. HOWELL: Good morning. Keith Howell from Oppenheim & Zebrak on behalf of the plaintiffs.

THE VIDEOGRAPHER: And do we have counsel on Zoom?

MR. GRUBOW: Jared Grubow from WilmerHale on behalf of Anthropic.

MR. CHUNG: Good morning. Timothy Chung on behalf of Publishers.

MS. MEHTA: And then I believe we have in-house counsel from Anthropic also on the line.

THE VIDEOGRAPHER: The court reporter today is Michelle Yohler representing Planet Depos.

Please swear in the witness.

(WHEREUPON, the witness was duly sworn.)

BEN ZHAO, Ph.D.,

called as a witness herein, having been first duly sworn, was examined and testified as follows:

EXAMINATION

BY MS. MEHTA:

Q Good morning.

A Good morning.

Q Dr. Zhao, could you please state your first -- or full name and your address for the record, please.

A Sure. Ben Zhao, my -- I'm sorry. You said my address?

Q Yes.

[redacted]

Q What do you understand this case to be about?

8

MR. HOWELL: Objection. Form.

BY THE WITNESS:

A I understand this case is about Anthropic's training of data and Anthropic's design of its large language model and its mechanism to operate that model.

BY MS. MEHTA:

Q What legal claims do you understand to actually be at issue in the case?

MR. HOWELL: Objection. Form. Calls for a legal conclusion.

BY THE WITNESS:

A I am not here to speak to the legality of the claims; I'm here as a technical expert, so, as such, I speak to the technical components of the case.

BY MS. MEHTA:

Q Understood. But you understand that in courts of law, the people actually make claims based on legal challenges and then defend on legal challenges --

A Yes.

Q -- right?

A Yes.

MR. HOWELL: Objection. Form.

161

an injected intentional randomness. And, in fact, even when you try to do that, getting real randomness into a system is known to be very, very difficult.

Q And you understand that large language models intentionally create systems that are probabilistic and not deterministic, don't you?

MR. HOWELL: Objection. Form. Vague.

BY THE WITNESS:

A Large language models don't intentionally do anything; they are software. The people who program and train them will do certain things.

But to the extent that that is your understanding and that's your intention, I will also say that, again, the people who design and train large language models have added parameters that intentionally add stochasticity.

BY MS. MEHTA:

Q Okay. And the people that design large language models intentionally have included parameters to make the large language model probabilistic, correct?

MR. HOWELL: Objection. Form. Vague. Calls for speculation.

162

BY THE WITNESS:

A You cannot add -- so, again, I'm sorry if I sound like I'm quibbling on terminology here, but a lot of these words and their meanings are important.

Probabilistic is not something that you can make something become. Probabilistic is something that is either there or not. So there are, for example, probabilistic algorithms that are designed to be probabilistic from the get-go, and you cannot make them non-probabilistic.

Similarly, you can't take a deterministic algorithm and make it probabilistic.

What you can do is you can intentionally add things so that it does not behave the same way every single time, but that does not make it probabilistic, at least from a strict definition of what probabilistic means.

BY MS. MEHTA:

Q You would agree that the designers of the large language models program the models to increase their being probabilistic?

MR. HOWELL: Objection. Form. And vague. Calls for speculation.

163

BY THE WITNESS:

A Again, you know, my same comment about what being probabilistic means. You cannot make something more probabilistic or not; the algorithm is either that or not.

To the extent that an LLM trainer can add randomness -- intentional randomness factor or parameter into the system does not mean that it becomes probabilistic; it just means that under certain conditions, when you give it certain inputs, running under certain parameters, it will not give you the same result consistently.

But under those same parameters, you can certainly give parameters that will allow it to be as natural deterministic form and give you largely or consistently the same answer every time.

BY MS. MEHTA:

Q You understand that large language models do not consistently give the same answer every time, right?

MR. HOWELL: Objection. Form. Speculation.

BY THE WITNESS:

A I understand that large language models under many operating conditions have operating

164

parameters that intentionally have them generate different things across multiple time frames. But that is an operating time parameter, and that is not fundamental to the large language models themselves.

BY MS. MEHTA:

Q Okay. Let's -- to use your language about the operating parameters or operating time parameters, I want to -- I want to include in my question the nature of the LLM itself and then the operating time parameters. So the system as a whole.

You agree that large language model systems including the models themselves and the operating time conditions have parameters that are intentionally set to generate different responses at different times?

MR. HOWELL: Objection. Form. Vague.

BY MS. MEHTA:

Q Including to the same stimulus.

MR. HOWELL: Calls for speculation.

BY THE WITNESS:

A So, again, what I'm trying to make clear -- and I'm not sure if it's clear or not, but when you have a parameter that is an add-on

461

CERTIFICATE OF REPORTER

I, MICHELLE M. YOHLER, a Certified Shorthand Reporter within and for the County of Will, State of Illinois, do hereby certify:

That previous to the commencement of the examination of the witness, the witness was duly sworn to testify the whole truth concerning the matters herein;

That the foregoing deposition transcript was reported stenographically by me, was thereafter reduced to typewriting under my personal direction and constitutes a true record of the testimony given and the proceedings had;

That the said deposition was taken before me at the time and place specified;

That I am not a relative or employee or attorney or counsel, nor a relative or employee of such attorney or counsel for any of the parties hereto, nor interested directly or indirectly in the outcome of this action.

462

IN WITNESS WHEREOF, I do hereunto set my hand and affix my seal of office at Chicago, Illinois, this 24th day of February, 2026.

Michelle M. Yohler

Michelle M. Yohler, CSR, RMR, CRR
Certified Shorthand Reporter
CSR No.: 84-4531

No. 621063

Re: Deposition of **Ben Zhao, Ph.D.**
Date: 2/20/2026
Case: Concord Music Group -v- Anthropic
Return to: transcripts@planetdepos.com

Errata

Page: Line	From	To
10:4-6	It's a long claim with a lot of complaints that I read three years ago.	It's a long **complaint** with a lot of **claims** that I read three years ago
26:19-21	I'm not going to get into my personal opinion about what are these issues called.	I'm not going to get into my personal opinion about what **all** these issues **are**.
36:18-19	I meant that if I have a form – fully formed definition	I meant that if I **had a fully** formed definition
81:79-81	we make sure that there is no offensive or legal content	we make sure that there is no offensive or **illegal** content
132:24	what current models do, and current models behave	what current models do, and **how** current models behave
177:15-17	The definition of a data retrieval system is incredibly expensive	The definition of a data retrieval system is incredibly **expansive**
188:23-25	There's cureration, there is weighting, there is all sorts of things that may or may not happen	There's **curation**, there is weighting, there is all sorts of things that may or may not happen
190:20	cureration	**curation**
191:1	tokenize table	**tokenizer** table
194:18	cureration	**curation**
222:25-223:3	I'm sorry. I assume including that is with the research documents but it also includes things like public press and, you know, newspaper and whatnot.	I'm sorry. I assume **included in** that **is the** research documents but it also includes things like public press and, you know, newspaper and whatnot.
289:1:	cureration	**curation**
293:17	cureration	**curation**
293:23	cureration	**curation**
294:3	cureration	**curation**
295:7	cureration	**curation**
295:10	cureration	**curation**
297:12	cureration	**curation**
297:15	cureration	**curation**

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Errata Cont'd

Page: Line	From	To
328:6	cureration	**curation**
449:19	cureration	**curation**
452:7	cureration	**curation**

4/1/26
(Date)

(Signature)

No. 621063

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Date: 2/20/2026
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ACKNOWLEDGMENT OF DEPONENT

I, Ben Zhao, Ph.D., 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.

4/1/26 _____
(Date) (Signature)