# EXHIBIT 166

# (FILED UNDER SEAL)

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC. ET AL., Plaintiffs, vs. ANTHROPIC PBC, Defendant. ) Case No. 5:24-cv-03811-EKL-SVK

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

30(b)(1) and 30(b)(6) DEPOSITION OF
DAVID BENJAMIN KOKAKIS
LOS ANGELES, CALIFORNIA
TUESDAY, NOVEMBER 11, 2025

Reported by: Aileen Neitzert, CSR No. 5318
Job No.: 605682

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UNITED STATES DISTRICT COURT
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CONCORD MUSIC GROUP, INC. ET AL., Plaintiffs, vs. ANTHROPIC PBC, Defendant. ) Case No. 5:24-cv-03811-EKL-SVK

30(b)(1) and 30(b)(6) DEPOSITION OF DAVID BENJAMIN KOKAKIS, taken on behalf of the Defendant, at 350 South Grand Avenue, Suite 2400, Los Angeles, California, beginning at 9:11 a.m., on Tuesday, November 11, 2025, before Aileen Neitzert, Certified Shorthand Reporter No. 5318.

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APPEARANCES:

FOR THE PLAINTIFFS:

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FOR THE DEFENDANTS:

WILMER CUTLER PICKERING HALE AND DORR LLP
By: LOUIS W. TOMPROS, ATTORNEY AT LAW
STEPHANIE LIN, ATTORNEY AT LAW (appearing via videoconference)
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Also Present:

Harut Hakopyan, Videographer

JoAn Cho, In-house Counsel, Universal

Ian Chen, In-house Counsel, Anthropic PBC (appearing via videoconference)

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Tuesday, November 11, 2025; 9:11 a.m.
Los Angeles, California
- - -
THE VIDEOGRAPHER: Here begins media number 1 in the videotaped deposition of David Kokakis in the matter of David Kokakis -- excuse me, 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 11, 2025. The time on the video monitor is 9:11 a.m. Pacific time. The videographer today is Harut Hakopyan representing Planet Depos. This video deposition is taking place at 350 South Grand Avenue, Suite 2400, Los Angeles, California 90071.
Would counsel please voice-identify themselves and state whom they represent, starting with the taking attorney.
MR. TOMPROS: Good morning. This is Louis Tompros from Wilmer Cutler Pickering Hale and Dorr, LLP, joined by my -- by Zoom by my colleague Stephanie Lin from the same firm, and also by Ian Chen from Anthropic, all representing Anthropic PBC, the defendant.
MR. KAPLAN: This is Alex Kaplan of Oppenheim + Zebrak representing the plaintiffs in the case and the witness today. And with me is JoAn Cho who is in-house counsel at Universal Music Publishing.
THE VIDEOGRAPHER: The court reporter today is Aileen Neitzert representing Planet Depos. The witness will now be sworn.
THE REPORTER: My name is Aileen Neitzert. My California CSR number is 5318.

DAVID BENJAMIN KOKAKIS,
having first been duly sworn by the reporter, was examined and testified as follows:

EXAMINATION

BY MR. TOMPROS:
Q. Good morning, Mr. Kokakis.
**A. Good morning.**
Q. Could you please state your full name and business address.
**A. Yes. David Benjamin Kokakis. I work at Universal Music Publishing Group, and the address is 2105 Colorado Avenue, Santa Monica, California 90404.**
Q. Have you given testimony at a deposition previously?
**A. Yes, I have.**
Q. How many times?
**A. I'm not certain of the exact number, but perhaps four or five.**
Q. Have you given testimony in a court before?
**A. Yes, I have.**
Q. How many times?
**A. In connection with my profession or personally or both?**
Q. Both, please.
**A. Both? I can't recall the exact number, but perhaps three or four.**
Q. And with regard to the depositions that you've given, how many of those were in a professional capacity?
**A. All of them.**
Q. And what was the subject matter of those cases?
**A. Copyright infringement.**
Q. And was your testimony during the course of your work at Universal?
**A. Yes.**
Q. What were those cases?
**A. I can't recall all of them, but I know that one was -- and perhaps the most recent one was in connection with an ISP case, an internet service provider. It was either Cox or Charter Bright House.**
Q. And do you recall any of the others?
**A. I don't.**
Q. And with regard to the courtroom testimony that you've given in a professional capacity, what was the nature of those cases?
**A. That was also an internet service provider case. Again, either Cox or Charter Bright House. I can't recall which.**
Q. You understand that you've taken an oath to tell the truth here today, right?
**A. Yes.**
Q. Are you presently under the influence of any alcohol, medication, or drugs that would impair your ability to testify truthfully here today?
**A. No.**
Q. And is there any other reason that you cannot give your best testimony here today?
**A. No.**
Q. I'm going to ask you questions. If there's anything about any of my questions that you don't understand, please let me know. Okay?
**A. Okay.**
Q. And if you answer a question, I'm going to assume that you understood it. Is that fair?
**A. Yes.**
Q. You have a pile of documents before you there just to your right, if you could grab those.

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[redacted]

Q. Is there a market for digital print editions of lyrics only?

MR. KAPLAN: Form objection.

THE WITNESS: There's -- there's a huge market for -- for digital lyric display, which would include something like what Hal Leonard may make available. That might not be their core business because they are known for a combination of notation and lyrics; whereas, there are other sites and search-based services that push out lyric display.

BY MR. TOMPROS:

Q. Are you aware of any service that charges end users for viewing direct display?

MR. KAPLAN: Form objection.

THE WITNESS: Karaoke companies in particular are based on the lyric display functionality being integrated into the experience of listening to the music.

BY MR. TOMPROS:

Q. Sure. I asked perhaps a bad question.

Are you aware of any companies -- excuse me. Strike that.

Are you aware of any service that charges end users for the display of lyrics alone?

**A.** [redacted]

Q. Are you aware of any service that charges end users for the digital display of lyrics alone?

MR. KAPLAN: Form objection.

THE WITNESS: I am not certain if Genius now has a subscription-based model for if Musixmatch or LyricFind or similar services have subscription offerings. Most of them tend to be ad-supported, which doesn't necessitate the user making a payment for access to lyrics, but the service itself picks up the cost out of the advertising revenue that's generated. So the cost to consumer isn't a cash payment. The cost to the consumer is their attention.

Just as you would have with broadcast TV where there are interstitial commercials running throughout programming and the user doesn't have to pay for it, but the currency is their attention. The same applies with radio, for instance, where terrestrial radio isn't paid for by the consumer, but the consumer's attention in interacting with the advertising is the payment that they're making. So that applies in many instances where you have lyrics-based digital services.

BY MR. TOMPROS:

Q. Consumers expect to be able to get lyrics online for free, right?

MR. KAPLAN: Form objection.

THE WITNESS: I don't know what the consumers expect. I know that that's how we see most lyrics-based digital services offering lyrics to consumers.

BY MR. TOMPROS:

Q. And before today, if you were trying to find out what the lyrics to Sweet Home Alabama were, what would you do?

**A. What would I personally do?**

Q. Yes.

**A. I would do an internet search if I was unable to decipher the lyrics from listening to the song itself.**

Q. What tool would you use for that internet search?

**A. I would likely go to one of the lyrics aggregators that we've talked about today, or I would do a Google search, which is a licensed service and has had a program in place for over a decade for transcribing lyrics and receiving lyrics from various sources, including some of the aggregators that we've talked about today.**

Q. What lyrics source does Google receive its lyrics from?

MR. KAPLAN: Form objection.

THE WITNESS: I am not certain exactly where

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[redacted]

BY MR. TOMPROS:
Q. If you wanted to look up the lyrics to Sweet Home Alabama online, would you expect to have to pay a fee?
MR. KAPLAN: Form objection.
THE WITNESS: If you mean in terms of cash out of pocket, no. In terms of attention so there's monetization that occurs, then yes.
BY MR. TOMPROS:
Q. If you wanted to look up the full text of a Wall Street Journal article online, would you expect to have to pay a fee?
MR. KAPLAN: Form objection and scope.
THE WITNESS: It depends on where I'm looking for it. If it's on WallStreetJournal.com, which I think is their site, I believe they offer a portion of the articles, and if you want to read through to the remainder of the articles, then you have to be a subscriber. And that's, I suppose, similar to lyric display with certain search functionality within Google

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where they will give you a preview of lyrics, and if you want the full lyric display, you have to be a subscriber to YouTube Premium or another service that has full lyric display licensed.
BY MR. TOMPROS:
Q. Does LyricFind put any lyrics behind a pay wall?
**A. I'm not certain if they do. I can't recall if they or Musixmatch offer a subscription service for access to lyrics in lieu of having advertising pushed at you.**
Q. [redacted]

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[redacted]

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[redacted]

BY MR. TOMPROS:
Q. Can I ask you to return to your declaration, which is Exhibit 7. Oh, sorry. Exhibit 16. I did that before. Exhibit 16.
Are you there?
**A. I am, yes.**
Q. And if I could ask you to look within Exhibit 16 at page 4, paragraph 12. Do you see that?
**A. Yes.**
Q. So beginning on -- well, why don't I just read two sentences. Beginning on line 13, it says, "Among other things, the UMPG Plaintiffs have licensed lyrics to lyric 'aggregators,' such as LyricFind...and Musixmatch.com," right? Do you see that?
**A. Yes, I do.**
Q. And then you go on to say, "These lyric aggregators are granted the right to distribute the UMPG Plaintiffs' lyrics through their own websites, as well as the right to sublicense the UMPG Plaintiffs' lyrics to other lyric websites and digital services, subject to the UMPG Plaintiffs' prohibition on certain uses and/or right to object to certain sublicenses." Do you see that?

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MR. KAPLAN: Yeah, I have no questions for the witness, so we can happily end the deposition.
MR. TOMPROS: Thanks very much for your time.
THE WITNESS: Thank you.
THE VIDEOGRAPHER: This marks the end of the deposition of David Kokakis. We're going off the record at 8:21 p.m.

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STATE OF CALIFORNIA )
) SS.
COUNTY OF LOS ANGELES )

I, DAVID BENJAMIN KOKAKIS, hereby certify under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
Executed this _____ day of _____
202__, at _____, California.

_____
DAVID BENJAMIN KOKAKIS

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STATE OF CALIFORNIA )
)
COUNTY OF LOS ANGELES )

I, AILEEN NEITZERT, do hereby certify:

That I am a duly qualified Certified Shorthand Reporter, in and for the State of California, holder of certificate number 5318, which is in full force and effect, and that I am authorized to administer oaths and affirmations;
That the foregoing deposition testimony of the herein named witness was taken before me at the time and place herein set forth;
That prior to being examined, the witness named in the foregoing deposition, was duly sworn or affirmed by me, to testify the truth, the whole truth, and nothing but the truth;
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 pages contain a full, true, and accurate record of the proceedings and testimony to the best of my skill and ability;
That review and correction by the witness was

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not requested.
I further certify that I am not a relative or employee or attorney or counsel of any of the parties, nor am I financially interested in the outcome of this action.

IN WITNESS WHEREOF, I have subscribed my name this 16th day of November, 2025.

Aileen Neitzert

_____
AILEEN NEITZERT, CSR NO. 5318

No. 605682

Re: Deposition of David Kokakis
Date: 11/11/2025
Case: Concord Music Group -v- Anthropic
Return to: transcripts@planetdepos.com

| Page | Line | Correction/Change and Reason |
|---|---|---|
| 16 | 8 | Change "Civil Procedure 36" to "Civil Procedure 30(b)(6)"; Clarification |
| 21 | 18 | Change "Draughton, D-R-A-U-G-H-T-O-N" to "Draughon. D-R-A-U-G-H-O-N"; Misspelling |
| 21 | 22 | Change "Draughton's" to "Draughon's"; Misspelling |
| 22 | 3 | Change "Draughton's" to "Draughon's"; Misspelling |
| 80 | 1 | Replace "but that's never nor should it be at" with "but that's never, nor should it be, at"; Clarification |
| 81 | 17 | Replace "anti-delusion" with "anti-dilution"; Mistranscription |
| 323 | 20-21 | Change "I believe in had human artistry" to "I believe in human artistry"; Clarification |

12/17/2025
(Date)

(Signature)

No. 605682

Re: Deposition of **David Kokakis**
Date: 11/11/2025
Case: Concord Music Group -v- Anthropic
Return to: transcripts@planetdepos.com

ACKNOWLEDGMENT OF DEPONENT

I, David Kokakis, 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.

12/17/2025 _____
(Date) (Signature)