EXHIBIT 124



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Transcript of Benjamin Mann, Corporate Designee

Date: November 20, 2025
Case: Concord Music Group -v- Anthropic

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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., : Civil Action No. 5:24-cv-03811-EKL-SVK

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

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VIDEOCONFERENCED (HYBRID) AND VIDEO-RECORDED

DEPOSITION OF DEFENDANT ANTHROPIC PBC

PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 30(b)(6)

BENJAMIN MANN

San Francisco, California

Thursday, November 20, 2025

9:03 a.m. Pacific Standard Time

VOLUME I

Job No. 609867

Pages: 1 - 228

Reported By: April L. Crites, RMR, CRR, CSR, CCR

California Certified Shorthand Reporter

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DEPOSITION OF BENJAMIN MANN

HELD AT THE OFFICES OF:

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* * *

Pursuant to notice, and pursuant to the Federal Rules of Civil Procedure, before April L. Crites, RMR, CRR, CSR, CCR, and California Certified Shorthand Reporter No. 14493.

* * *

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* * *

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Q Please turn to the Zoom in front of you, and you should find there what was has been previously marked as Plaintiffs' Exhibit 1.
(Plaintiffs' Exhibit 1, Plaintiffs' Notice of Deposition to Defendant Pursuant to Federal Rule of Civil Procedure 30(b)(6), was marked and presented for purposes of identification.)
THE WITNESS: Okay.
BY MR. MILLER:
Q You have Plaintiffs' Exhibit 1 open in front of you?
A Yes, I do.
Q You recognize Plaintiffs' Exhibit 1?
A Should I open it on my computer?
MS. GOMEZ-REICHMAN: You should be able to scroll.
THE WITNESS: Oh, in yours?
MS. GOMEZ-REICHMAN: Or you should have your own access.
THE VIDEOGRAPHER: If you click on the Zoom screen --
THE WITNESS: Uh-huh.
THE VIDEOGRAPHER: -- you can control.
THE WITNESS: Oh, I see. It's just a bit delayed. Okay.

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Sorry. How do I scroll half a page? If I scroll a little bit, it jumps to the second page.
THE VIDEOGRAPHER: Try the down arrow.
THE WITNESS: Yes, this looks familiar.
BY MR. MILLER:
Q And Plaintiffs' Exhibit 1 is Plaintiffs' Notice of Deposition to Anthropic Pursuant to Rule 30(b)(6).
A Sorry. What's the question?
Q Do you recognize Plaintiffs' Exhibit 1 as Plaintiffs' Notice of Deposition to Anthropic, Pursuant to Rule 30(b)(6)?
A I don't see specifically where it says 30(b)(6), but that sounds correct.
Q Do you understand that you have been designated by Anthropic to provide deposition testimony today on behalf of Anthropic on some of the topics listed in this notice?
A Yes, I do.
Q Are you prepared to testify today as Anthropic's corporate designee on the topics on which Anthropic has designated you?
MS. MEHTA: Subject to our objections and the scope of the testimony, which has been discussed extensively by the lawyers.

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THE WITNESS: Yes. Subject to the amendments, yes, I'm prepared to testify.
BY MR. MILLER:
Q Have you read the complaint in this case?
A I believe I have.
Q Do you have an understanding of the allegations that are at issue in this case?
A Yes, I believe I have an understanding.
Q What did you do to prepare to testify today on behalf of Anthropic?
A I prepared quite extensively for this. First of all, I'm sort of naturally an expert in many of the topics due to working at Anthropic, since we founded the company as one of the cofounders, and my involvement in many of the topics, and firsthand experience doing the work. Secondly, I've had correspondences; I guess, officially, I've been educated by many of the company's experts on the relevant topics for the purpose of this deposition. I've also done roughly 12 hours of preparation over four days, looking at dozens of different documents that are relevant to the case. And I've also been previously deposed on a similar topic and did quite extensive preparation

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as a 30(b)(6), among probably others -- a few other things that -- those are the main things.
Q Okay. In your answer, you said that you've been educated by many of the company's experts on the relevant topics.
Whom at the company did you speak with in order to prepare for today's deposition?
A I have a list in my notes here. The people that I've spoken to -- and I'll give the list to the court reporter after I read them -- are Dario Amodei, Saurav Kadavath, Sandipan Kundu, Ludwig Schmidt, Adam Ratana, Alex Tamkin, and Mycal Tucker.
Q And what is the document that you have in front of you?
A This is a document that my -- that Sonal provided with me as a preparation for this deposition. At the top, it says, Ben Mann 30(b)(6) Deposition. And it has the names that I read, and at the bottom, there's a 1. And that's all the content on the document.
MR. MILLER: Let's go ahead and mark that as an exhibit.
I forget what the next number is in the -- where we left off.

Pages 61-64

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A Those describe what kind of crawling we were likely to be doing with this Common Crawl crawler repository.
Q And then column C has a header Robots.txt Support.
Do you see that?
A Yes.
Q What does the data in column C describe?
A To the best of our knowledge, this describes the level of robots.txt support for this specific Common Crawl crawler repository.
Q And to the best of your knowledge, are the -- is the information in column C accurate?
MS. MEHTA: Objection to the form.
THE WITNESS: I believe it's accurate, but we couldn't find anybody who had access to this repository to verify.
BY MR. MILLER:
Q And do you see that column D has the header Commit to Verify?
A Yes.
Q What does column D contain?
MS. MEHTA: Form.
THE WITNESS: So the links --
BY MR. MILLER:

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Q Excuse me.
A -- in this column are to GitHub. They are under an organization that Anthropic doesn't control. Gyula Lakatos --
THE COURT REPORTER: I'm sorry?
THE WITNESS: Should I spell it?
THE COURT REPORTER: Mm-hmm.
THE WITNESS: G-Y-U-L-A, L-A-K-A-T-O-S.
Gyula was a contractor that Anthropic hired to help us build some web crawling and scraping infrastructure, originally, as I [redacted]
And so this link would have been to a specific commit. So, in a software repository, like one hosted on GitHub, software is built up iteratively, and individual commits showed individual changes to that software repository, which lines in which files were changed and how, and by who.
And my strong expectation is that if we were to follow this link, and we had permission to view the -- the destination, then we would see the state of the repository at the time indicated in column A or at the date indicated in column A.
BY MR. MILLER:
Q Anthropic does not currently have access to the information contained at the links in column D?
MS. MEHTA: Objection to the form.
THE WITNESS: We made reasonable -- reasonable efforts to find access, but despite talking to many of the people who would reasonably know or have access, we were unable to find anyone. And the person whose -- who created this is no longer at Anthropic.
BY MR. MILLER:
Q That was Gyula Lakatos?
A Yes.
Q When did Gyula Lakatos' employment or retention by Anthropic end?
MS. MEHTA: Objection to the form.
THE WITNESS: I don't know the exact end date.
BY MR. MILLER:
Q Turn to column B, please.
Do you see that in cell B-2, the document states, [redacted]?
What is [redacted]?

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A RSS and Atom feeds are two different standards for getting subscription-style updates to website content.
So, for example, a web -- a news website might publish an RSS feed anytime a new news article comes out. That will appear in this RSS or Atom feed.
And parsing, I believe that would be to collect the links that that page would entail. And from the context, I believe that would be RSS or Atom feed pages that we knew existed based on the Common Crawl Index.
[redacted]
MS. MEHTA: Objection to the form.
[redacted]
BY MR. MILLER:
Q Okay. And then, in cell B-3, the next entry in column B, it states added document crawling, correct?