EXHIBIT 141



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Transcript of Alisa Coleman, Designated Representative & Individually

Date: October 29, 2025
Case: Concord Music Group -v- Anthropic

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

Videotaped Deposition of
ABKCO MUSIC & RECORDS, INC.
By and Through Its Designated Representative
ALISA COLEMAN
In Her Corporate and Individual Capacity
New York, New York
Wednesday, October 29, 2025
9:10 A.M.

H I G H L Y C O N F I D E N T I A L
A T T O R N E Y S' E Y E S O N L Y

Pages: 1 - 239
Reported By: Anita M. Trombetta, RMR, CRR,
California CSR No. 14647

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Videotaped deposition of ABKCO MUSIC & RECORDS, INC., by and through its designated representative, ALISA COLEMAN, in her corporate and individual capacity, held at the offices of:

Wilmer Cutler Pickering Hale & Dorr LLP
7 World Trade Center
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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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ENRIQUE CASAS, Videographer

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beginning with the number ABKCO ending 52 and going through ABKCO ending 68.
Do you have that in front of you?
A I do.
Q This is a license agreement between ABKCO and LyricFind, right?
A Yes.
Q Are the lyrics that LyricFind displays accurate?
ATTORNEY KAPLAN: Form objection.
A I don't know.
Q Are the lyrics that LyricFind displays for the asserted ABKCO works accurate?
ATTORNEY KAPLAN: Form objection.
A I don't know.
Q Are the lyrics that LyricFind displays for the ABKCO works genuine?
ATTORNEY KAPLAN: Form objection.
A I don't know what "genuine" means.
Q Okay. Can you say one way or another whether the lyrics that LyricFind displays are genuine and materially accurate as to the ABKCO works in suit?
A I have not checked the LyricFind site.
ATTORNEY KAPLAN: Note my form objection.

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ATTORNEY TOMPROS: Thank you.
(Coleman Exhibit 17, marked for identification.)
Q Ms. Coleman, you have been handed what has been marked as Exhibit 17, a two-page document. And at the bottom it has the website https://lyrics.lyricfind.com/lyrics -- sorry -- /lyric/the-verve-bitter-sweet-1.
Do you see that?
A I do.
Q And I'll represent to you that this page is a printout of the URL depicted at the bottom of the page.
In Coleman Exhibit 17, the title is shown as three words, correct?
A Correct.
Q And in the second full paragraph of the lyrics, it says, "No change, I can change, I can change, I can change," right?
A Correct.
Q Now, in the title "Bitter" and "Sweet" are two separate words, right?
A Yes.
Q But in the first line of the lyrics, "bittersweet" is listed as one word, right?

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ATTORNEY KAPLAN: Form objection.
A Yes.
Q Which is accurate?
ATTORNEY KAPLAN: Form objection.
A Both.
Q And just to confirm, you did not review the lyrics to "Bittersweet Symphony" on any of these websites before today, right?
A That's correct.
Q You did not review the lyrics to "Bittersweet Symphony" on LyricFind before today, right?
A That's correct.
Q Could I ask you to return to your declaration.
A I don't know. Which one is it?
Q Yeah, I'll find it for you. Hold on.
It is Exhibit 4.
A Okay. Going down. Let's see if I have it here. I thought I put these in order.
I'm just trying to keep them in order.
Q Yeah, I understand. Take your time.
ATTORNEY KAPLAN: Louis is trying to set the record for most exhibits marked in the first half.

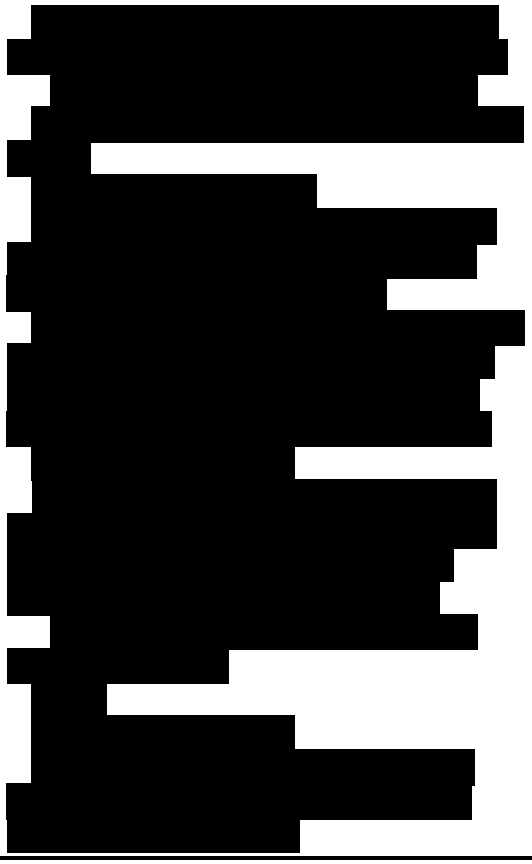
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THE WITNESS: Or most trees killed.
A Okay. I found 4.
Q Okay. So you are on your sworn declaration, Exhibit 4, right?
A Yes.
Q All right. If we could go to page 5.
A Page 5.
Q Paragraph 18. And it says, "For purposes of this case, I have confirmed that the lyrics to the ABKCO works available on the lyric aggregator lyricfind.com are genuine and materially accurate," right?
A Obviously I misspoke. I must have checked them.
Q When did you check them?
A Probably --
ATTORNEY KAPLAN: Form objection.
A -- within --
THE WITNESS: Oh, sorry.
[redacted]
Q I got it. Okay.
And how did you determine that the lyrics on LyricFind were genuine and materially accurate?
A Well, we delivered the lyrics to

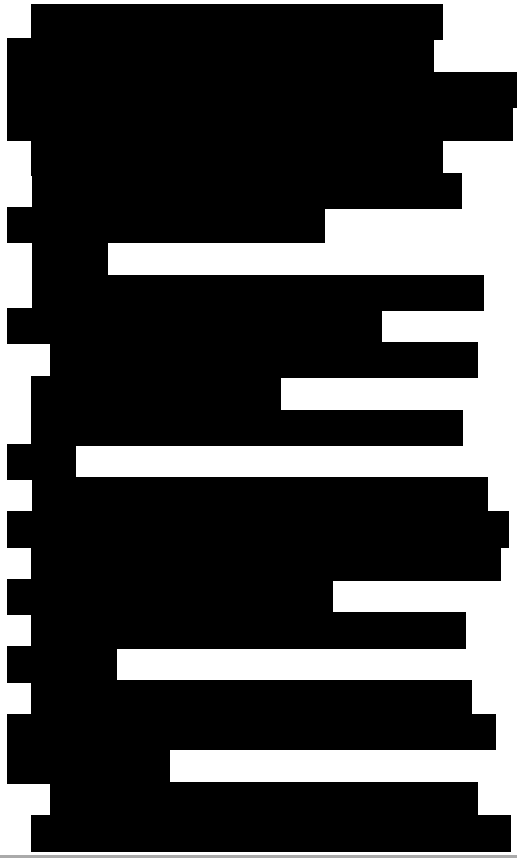
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LyricFind.
Q I see.
So if we return to Exhibit 17, the lyrics that ABKCO --
A Hold on. 17.
Yes?
Q The lyrics that ABKCO delivered included "bittersweet" as one word in the first line, but "Bitter" and "Sweet" as two separate words in the title, right?
ATTORNEY KAPLAN: Form objection.
A Yes, because the -- I don't need to give you a "because."
Q Okay. So -- and making sure I understand this correctly, the time at which you compared the lyrics find lyrics -- strike that.
The time at which you reviewed the LyricFind lyrics to confirm that they were genuine and materially accurate was at the time at which the lyrics were delivered to LyricFind, right?
A That's correct.
Q Several years ago, right?
A Yes.
Q Well before this case, right?
A Yes.

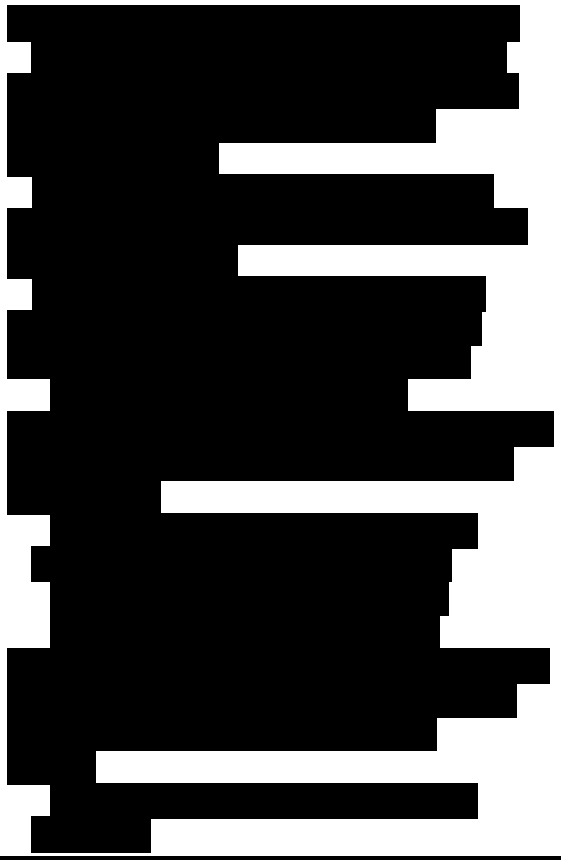
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Q Okay. Are you familiar with the term "copyright management information" in the context of material that a accompanies a copyrighted work's printing?
ATTORNEY KAPLAN: Form objection.
A Can you repeat that?
Q Sure.
Are you familiar with the term "copyright management information" in the context of material that accompanies the printing of a copyrighted work?
ATTORNEY KAPLAN: Form objection.
A That accompanies, is that what you're saying.
Q Yes.
A In terms of the copyright notice at the bottom, yes.
Q Is the copyright notice a form of copyright management information?
A Yes, absolutely, because it's created when it's registered at the copyright office.
Q And are you aware that there is a statute that explains what is other things count as copyright management information --
ATTORNEY KAPLAN: Form objection.

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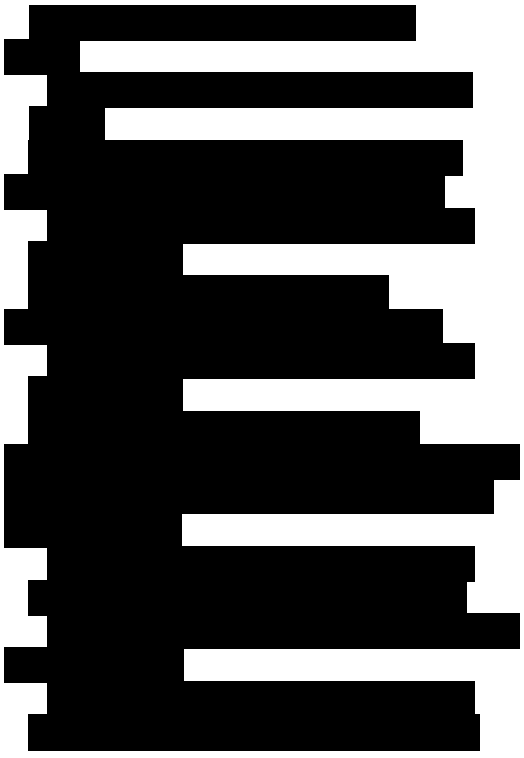
Q -- like the law?
A I'm not sure. I need to be reminded.
Q Sure.
Does -- in your understanding, does copyright management information include the name of a song?
A Yes.
Q Okay. Does it include the name of the composer?
A Yes.
Q The lyricist?
A Yes.
Q Copyright notice?
A Yes.
Q Name of the publisher?
A Yes.
Q Okay. Does ABKCO require lyric aggregator websites to include copyright management information along with the lyrics it displays?
A Yes.
Q And is that part of the licenses with those organizations?
A Yes.
Q What information does ABKCO require the aggregator to include?

115

ATTORNEY KAPLAN: Form objection.
A Song title, writers, both -- any type of composers, and the publisher.
Q And the publisher would be, for example, ABKCO, right? I guess I shouldn't say "for example."
For ABKCO works, the publisher would be ABKCO, right?
A Yes.
Q And so you would require lyrics websites to include ABKCO as part of the required copyright management information, right?
A That's correct.
Q Do you require lyrics websites to include a copyright notice, that is the circle C or the word "copyright" anywhere?
ATTORNEY KAPLAN: Form objection.
A I'd have to look at the agreement.
Q Okay. You're not sure one way or the other?
A Yes.
Q Okay. I'm going to have you dig back into your exhibits to Exhibit Number 14.
A Let's see. This pile (indicating). No.

116

Here it is (indicating).
Q Are you with me on Exhibit Number 14?
A Sure.



Pages 129-148

129

A Yes.

(Coleman Exhibit 24, marked for identification.)

Q Ms. Coleman, you're now being shown what has been marked as Coleman Exhibit 24, a document that begins with the control number ABKCO ending 1267, going through 1279.

Do you have that in front of you?

A I did.

Q What is it?

A It is a print -- reprint license to Guitar World for a nonexclusive, one-time use of our songs.

130

(Coleman Exhibit 25, marked for identification.)

Q All right. Ms. Coleman, you have been handed what has been marked as Coleman Exhibit 25. It is a -- what appears to be an email message and has the control number at the bottom ABKCO ending 662 through 669.

Do you have that in front of you?

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A Yes, I do.

Q And I know that you probably don't usually -- well, you may, I don't know. Most people don't read emails printed out. But just so that you've got it clear, this begins at the top and on the first page with the most recent email and then concludes everything else in the chain below it.

A Yes.

Q It's kind of proceeding counter-chronologically. Okay?

A Yes.

Q And what is Exhibit 6 -- excuse me Exhibit 25?

A It's an email exchange authorizing the lyric reprint -- hold on.

132

133

[redacted]

Q I am going to return to some of the older exhibits, and I don't know if you want to pull them all out before we -- before I do or not, but I'm going to go back to the lyric website agreements. It's Exhibits 11, 13, and 16.

A Okay. Wait a second.

11, is that what I'm looking for?

Q Yeah. 11, 13, and 16 are the ones I want to talk about.

A There it is.

Okay.

Q All right. So looking at Exhibit 11, this is the one that involves Genius Media Group.

134

Do you remember talking about that earlier?

A Yeah.

Q All right. Let's look at page 3 of that agreement, continuing on to page 4. It says -- under "Grant of Rights" at the bottom of page 3, it says, "Licensor hereby grants to licensee the nonexclusive right and license during the term throughout the world to reproduce and display the lyrics of licensed compositions in, on or through the service," right?

Do you see that?

A Yes.

Q And "the service" is itself defined back on page 3. And it includes at the bottom of the definition, "applications known or hereafter developed," right?

A "Limited to" -- "limited to Genius and/or Rap Genius, Genius.com."

Q Okay. So --

A It is a technology, not an exploitation.

Q Got it.

So the exploitation that Genius and Genius -- and Rap Genius can do includes reproduction and display, right?

135

ATTORNEY KAPLAN: Form objection.

A (Document review.)

It's the -- can you clarify your question?

[redacted]

136

[redacted]

137

[redacted]

138

[redacted]

ATTORNEY KAPLAN: Form objection.

A Could you be specific?

Q Actually, I think the easiest way to do this might just be to look at your declaration, Exhibit 4. That might get us there faster on this issue.

So if you look at your declaration.

A Hold on. Let me find it.

Yes.

Q If you look at your declaration, Exhibit 4 at page 4, the bottom of paragraph 12, starting on line 25, it says, "ABKCO's licenses with lyric aggregators and Alfred Music permit these licensees to further license third parties."

A That's correct.

Q And is that a correct statement?

ATTORNEY KAPLAN: Form objection.

A It's correct to the licenses in effect at the time.

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Q Okay. And was the Genius license in effect at the time you signed your declaration?

A I'd have to check.

(Document review.)

No, it was not.

Q Okay. Well, that answers that.

When did the Genius license stop being in effect?

A 2020.

[redacted]

Q Could we look at the Musixmatch license, Exhibit 13.

And this Musixmatch license, I'm looking at the first page which ends in the control number

140

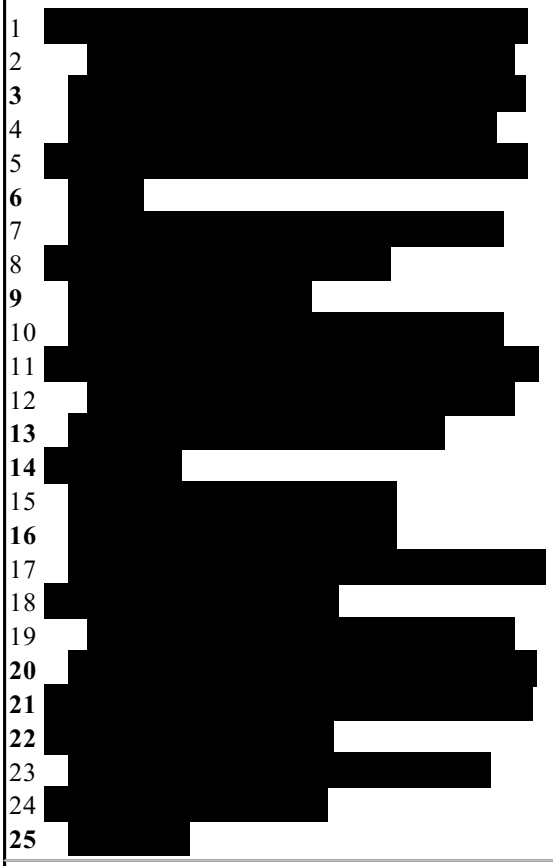
45.

Are you with me?

A Yes.

[redacted]

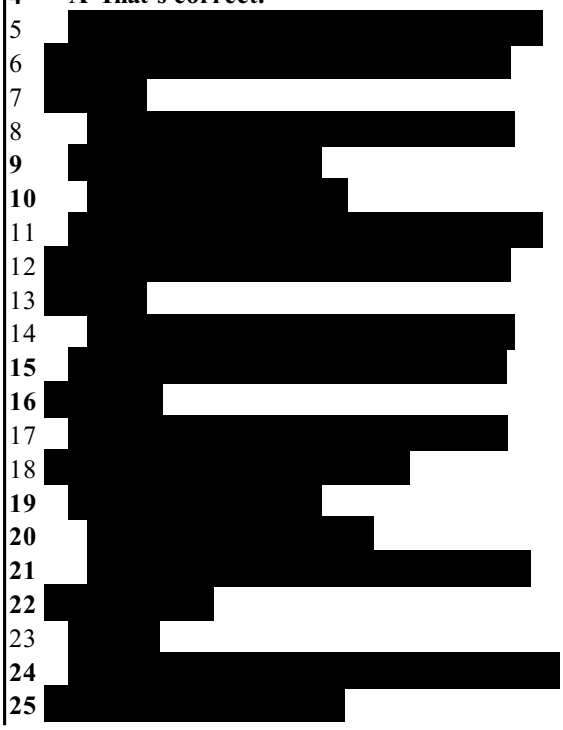
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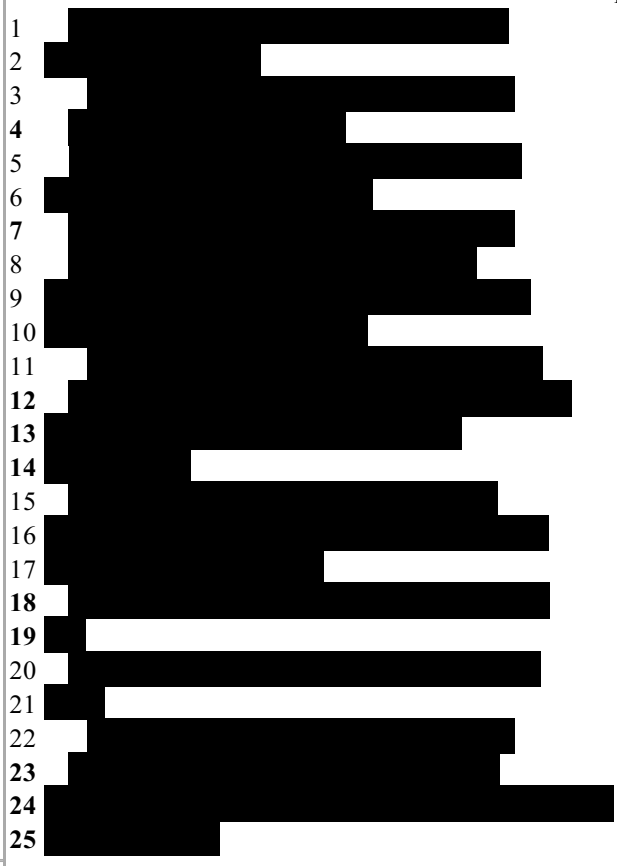
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Q According to your declaration, Exhibit 4, Musixmatch had the right to further license to third parties, correct?

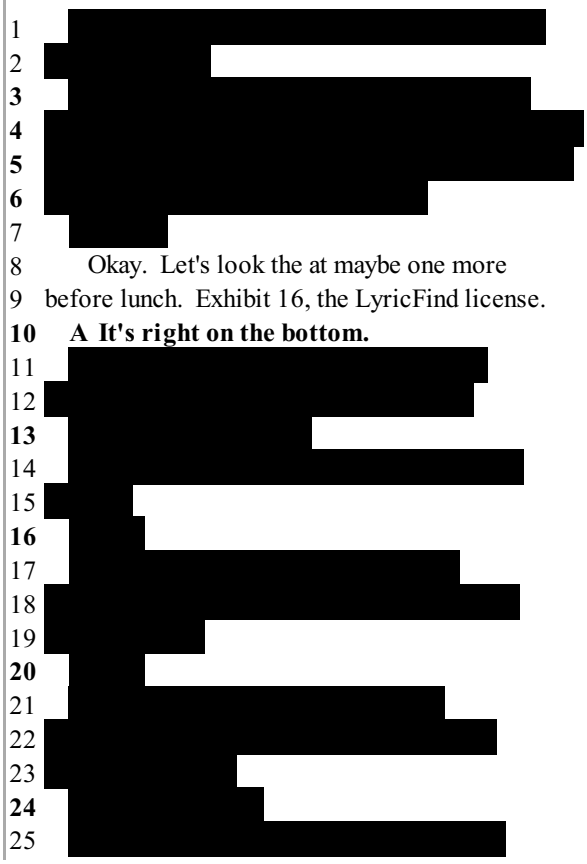
A That's correct.



143



144



Okay. Let's look the at maybe one more before lunch. Exhibit 16, the LyricFind license.

A It's right on the bottom.

145

[redacted]

146

[redacted]

Q Has ABKCO --

[redacted]

147

[redacted]

Q Okay.

ATTORNEY TOMPROS: Should we take a break?

ATTORNEY KAPLAN: Sure.

THE VIDEOGRAPHER: We are going off the record. The time is 12:45 P.M.

(Luncheon recess.)

THE VIDEOGRAPHER: We're back on the record and the time is 1:32 P.M.

BY ATTORNEY TOMPROS:

Q Welcome back, Ms. Coleman.

[redacted]

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[redacted]

Q I've got, like, a bunch.

ATTORNEY KAPLAN: We'll find out.

(Coleman Exhibit 26, marked for identification.)

Q Ms. Coleman, you have been handed what has been marked as Exhibit 26, a document with the control numbers ABKCO_429 through 444.

Do you have that in front of you?