EXHIBIT 142



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HIGHLY CONFIDENTIAL
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SUBJECT TO PROTECTIVE ORDER

Transcript of Kent Draughon, Designated Representative

Date: November 5, 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-SVK
ANTHROPIC PBC, :
Defendant. :
- - - - - - - - - - - - - x

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY -
SUBJECT TO PROTECTIVE ORDER
REMOTELY CONDUCTED VIDEOTAPED DEPOSITION OF
KENT DRAUGHON AS CORPORATE DESIGNEE ON BEHALF OF
CAPITOL CHRISTIAN MUSIC GROUP
WEDNESDAY, NOVEMBER 5, 2025
9:02 A.M. CST

JOB NO.: 606143
PAGES: 1 - 269
REPORTED BY: KARISA EKENSEAIR, CCR RPR RMR RDR
CA CSR #14546

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DEPOSITION OF KENT DRAUGHON, AS CORPORATE DESIGNEE, CONDUCTED VIA ZOOM VIDEOCONFERENCE.

Pursuant to notice, before Karisa J. Ekenseair, Certified Shorthand Reporter in and for the States of Arkansas, Oklahoma, Missouri, Illinois, Tennessee, Georgia, New Mexico, Washington, and California; National Registered Professional Reporter; National Registered Merit Reporter; National Registered Diplomate Reporter; Notary Public.

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A P P E A R A N C E S

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EXHIBITS
(ATTACHED TO TRANSCRIPT)

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Pages 49-52

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[redacted]

Q (Technical disruption) the music industry, Mr. Draughon?

A I'm sorry, your audio cut out there. What was that?

Q I'm sorry. Just how long have you worked in the music industry?

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A Been blessed to do this for more than 30 years now.

Q In your 30 years of experience in the industry, have you -- do you think it's typical for songwriters to copyright lyrics separately from the rest of the musical composition?

MR. KAPLAN: Form objection; and scope.

A Just stating that back to you. Did you ask do I think it's typical --

Q Yes.

A -- of writers to register lyrics separate from melody? I do not think it's typical.

[redacted]

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[redacted]

Q If we could, let's go to Exhibit 5 which will be -- and we'll come back to your declaration at different points through the day today, so you might want to leave that one handy.

MS. MEHTA: But I'm going to go ahead and mark as Exhibit 5 Tab 13, please.

REMOTE TECHNICIAN: Yes. One moment.

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(Exhibit 5 marked for identification.)

REMOTE TECHNICIAN: Should be in the Chat now.

Q Great. If you could look at Exhibit 5, Mr. Draughon, this is a document bearing the number UPMG 0000000578. And then it is a table that has a list

[redacted]

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[redacted]

MS. MEHTA: We've been going for -- I don't even know how long, quite a while, and we went through a long litany of questions, so maybe now is a good time for a break.

THE WITNESS: Understood.

THE VIDEOGRAPHER: We are going off the record. The time is 11:40.

(Whereupon a break was had.)

THE VIDEOGRAPHER: We are back on the record. The time is 11:51.

BY MS. MEHTA:

Q Mr. Draughon, did you talk to counsel during the break?

A Did not.

Q Did you talk to either of your colleagues or anyone during the break?

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A No.

[redacted]

Q Going back to your declaration that was Exhibit 4, if you could go to paragraph 24?

A Yes.

Q The second sentence there says, "In the past, CCMG songwriters have declined requests to change just a few words in a given song given that even minor changes in lyrics can have an outsized impact on the meaning of a song."

Do you see that?

A I do see that, yes.

Q And that's something you said to the Court under oath, correct?

MR. KAPLAN: Form objection.

A Yes.

Q And I take it you stand by that and believe that to be true?

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A Yes.

Q Are you familiar with -- or you can go back and look at the list of songs if you need to, list of compositions if you need to.

The composition "God of Wonders" is one of the asserted works in this case, right?

A I believe it is. Yes. I see it.

MS. MEHTA: Let's go ahead and mark if we could as Exhibit 9 Tab 22.

(Exhibit 9 marked for identification.)

REMOTE TECHNICIAN: Yes, one moment. That was 22?

MS. MEHTA: That's right.

Q Okay. You should have -- there it is. You should now have Exhibit 9.

A Downloading. Okay. I see.

Q Right. Exhibit 9 is a LyricFind -- a screenshot or printout from LyricFind for "God of Wonders."

Do you see that?

A I do see that.

Q Okay. And LyricFind is a website that Capitol CMG licenses its lyrics to, correct?

A That's correct.

Q So this would be an authorized license --

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licensed or authorized production of the lyrics for that composition; is that right?

MR. KAPLAN: Form objection.

A This is authorized.

Q Okay. Now, if you could go to the stanza that starts "So Early in the morning."

A Yes.

Q And it says, "As I stumble into darkness (I will call Your name by night)."

Do you see that?

A I do see that.

Q Okay. Now, if you could go to the stanza that starts, "Sing God of wonders."

A Yes.

Q Okay and if you look at that, it says -- the third line down says: The pressure is low, reveal your heart to me.

Do you see that?

A I do see that.

Q Okay.

MS. MEHTA: Now, I'm going to have marked as Exhibit 10 Tab 21.

REMOTE TECHNICIAN: One moment.

(Exhibit 10 marked for identification.)

REMOTE TECHNICIAN: Should be in the Chat.

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Q And Mr. Draughon, if you look at Exhibit 10, Tab 21, you will see a printout from Musixmatch. Do you see that?
A Getting there. Yes. I see Musixmatch at the top, yes.
Q And Musixmatch is also a site that you -- that Capitol CMG licenses its lyrics to, correct?
A That's correct.
Q So this is an authorized set of lyrics for "God of Wonders," correct?
MR. KAPLAN: Form objection.
A Yes.
Q If we look at the lyrics here and we go down to the third stanza that starts with "So early in the morning"?
A Yes.
Q Do you see the line that says, "As I stumble in the darkness"?
A Yes.
Q Here, there's no parenthetical after that that says "I will call your name by night," correct?
A I do see that.
Q So that's different than the lyrics that we saw in the LyricFind website, correct?

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MR. KAPLAN: Form objection.
A Seems to be calling out the duet harmony part.
Q Okay. But the actual lyrics that are reflected on the Musixmatch page are different than the LyricFind page?
A Yes.
MR. KAPLAN: Form objection.
Q And if we look at the stanza that says "(Sing God of wonders)" where we -- on the music -- I'm sorry, on the LyricFind website we saw the line "The pressure's low, reveal your heart to me."
Do you recall that?
A I do.
Q Okay. Why don't you look for that line here. What does that line say here?
A "Precious Lord, reveal Your heart to me."
Q Okay. So in one case of authorized lyrics, the line is, "The pressure's low, reveal Your heart to me," and in the other case of authorized lyrics, the line is "Precious Lord, reveal your heart to me."
Do you see that?
A I do see that.

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Q Just a few words, but a pretty big difference; isn't that right?
MR. KAPLAN: Form objection.
A Yes. It's a difference.
Q In fact, that's the kind of difference you were talking about in your declaration where you said that a change of just a few words could have an outsized impact in the meaning of a song, isn't it?
MR. KAPLAN: Form objection.
A This definitely doesn't, I think, rise to objectionable, but it is a difference.
Q Right. Well, it's an important difference, right? "The pressure is low" versus "precious Lord" in a song of worship is a pretty big difference, isn't it?
MR. KAPLAN: Form objection; asked and answered.
A I stand by my answer.
Q It's pretty big, isn't it, sir?
MR. KAPLAN: Same objection.
A Same answer.
Q Let me ask the question this way: You agree that in a song of worship, changing the lyrics from "precious Lord" to "the pressure's low" or vice versa has an impact on the meaning of the song,

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wouldn't you?
A Can you repeat the question?
Q Yes. In a song of worship, changing the words from "precious Lord" to "the pressure's low" are vice versa is a pretty big impact on the meaning of the song.
You'd agree with that?
MR. KAPLAN: Form objection.
A I think it has an impact to that line of the song for sure.
MS. MEHTA: If we could mark as the next exhibit Exhibit 11, Tab 20, please.
REMOTE TECHNICIAN: Yes. One moment.
(Exhibit 11 marked for identification.)
REMOTE TECHNICIAN: Should be in the Chat.
Q Great. Mr. Draughon, if you could look at Exhibit 11.
A Getting there.
Q Okay. Those are the AZLyrics for "God of Wonders."
Do you see that?
A I do see lyrics of "God of Wonders." I'm looking for AZ there --
Q Right there at the bottom, copyright "2025 AZLyrics.com."

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A No.
Q Has Capitol CMG made a request to the copyright office for a copy of the deposit copy for any of the 31 asserted works?
MR. KAPLAN: Objection, scope; lacks foundation.
A No.
Q Do you know what copyright management information is? Is that a term that's familiar to you?
A I believe that refers to the crediting of the songwriters, copyright notice, things of that nature.
Q Okay. So let -- let's explore what your understanding is when you say crediting of the songwriters and copyright notice.
What specific information do you understand to be copyright management information?
MR. KAPLAN: Objection, vague; calls for a legal conclusion.
A Yes. Any given songs covering management information I think should include all the songwriters who were a part of it, as well as the copyright notice which would have a year; list of publishing owners; perhaps parenthetical references

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to PRO, performance rights organizations; along with words like "all rights reserved" or "used by permission"; perhaps instructions on where to go to secure permission for that song, a web address, a street address.
Q Anything else that you consider to be copyright management information?
A Another thing comes to mind is the title, the title of the song.
Q Anything else?
MR. KAPLAN: Same objections as stated.
A I mean, on an administrative level, you could get all the way down to writer splits and publisher splits and a number of things that aren't necessarily a part of public information but are definitely management information for the song.
Q Does Capitol CMG require lyric websites to which it licenses lyrics to include copyright management information on what -- when they display lyrics?
A Yes.
Q What specific copyright information do you contractually require those websites to include?
A It is either what is provided from us on a license or made available on a website or what they

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have found in published authorized releases.
Q Well, let's -- let's take, for example -- let's take a particular lyric site, so LyricFind. That's one of the sites to which Capitol CMG licenses lyrics, correct?
A Yes.
Q Okay. So I'm looking at lyric -- at the LyricFind printout that we had that we were looking at a moment ago, and that was Exhibit 9. That's the LyricFind printout for "God of Wonders."
Do you see that?
A I do see that. Yes.
Q Okay. Now, looking at that, I see here the title of the song, right?
A Yes.
Q And then at the bottom there, it says "writers," right; Marc Byrd and Steve Hindalong?
A Yes.
Q And then it says "publishers," and it says "Lyrics at Capitol CMG Publishing, Integrity Music, Warner Chapel Music, Inc."
Do you see that?
A I do see that.
Q Okay. Now, it doesn't say anywhere on here "all rights reserved" or "use by permission," right?

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MR. KAPLAN: Form objection.
A I don't see that.
Q It doesn't have here any kind of mailing address or street address or contact information for where rights to the musical work could be obtained, does it?
MR. KAPLAN: Form objection.
A I don't see that.
Q Why don't you go to, if you would, sir -- let me pull up the tab here. Exhibit 11, those are the AZLyrics.
Do you see that?
A I do.
Q Those are AZLyrics for that same song we were talking about earlier, "God of Wonders," right?
A Yes.
Q And it has the name of the song, right?
A Name at the top, yes.
Q Okay. And then it says "Writers, Marc Byrd," Mike -- "Marc Byrd and Steve Hindalong," right?
A Yes.
Q And then it has a copyright notice, but that copyright notice is just for azlyrics.com, right?
A I see that.

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MS. MEHTA: Let's go ahead and mark as the next exhibit Tab 25. This will be Draughon Exhibit 21.

REMOTE TECHNICIAN: One moment.

(Exhibit 21 marked for identification.)

REMOTE TECHNICIAN: Sorry, what was that tab number?

MS. MEHTA: 25.

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[redacted]

MS. MEHTA: Let's mark the next exhibit, Exhibit 22, and that would be Tab 23.

(Exhibit 22 marked for identification.)

REMOTE TECHNICIAN: One moment.

[redacted]

MR. KAPLAN: Mr. Draughon, you should take the time you need to look through any of these. We're jumping right into questions on them before the witness has even had a chance to scroll through it.

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Q Your -- Mr. Draughon, if you need to look at something, I think you've been doing that throughout. And you've taken me to the paragraph that you needed to look at. You're welcome to keep doing that. Fair?

A Understood.

Q Okay. And I haven't stopped you from doing that at any point, have I?

MR. KAPLAN: You haven't stopped him. You haven't given him the opportunity either.

A No.

Q Have I -- have I pressured you not to look at any part of the agreement, Mr. Draughon?

MR. KAPLAN: Objection to the form of that question.

A No.

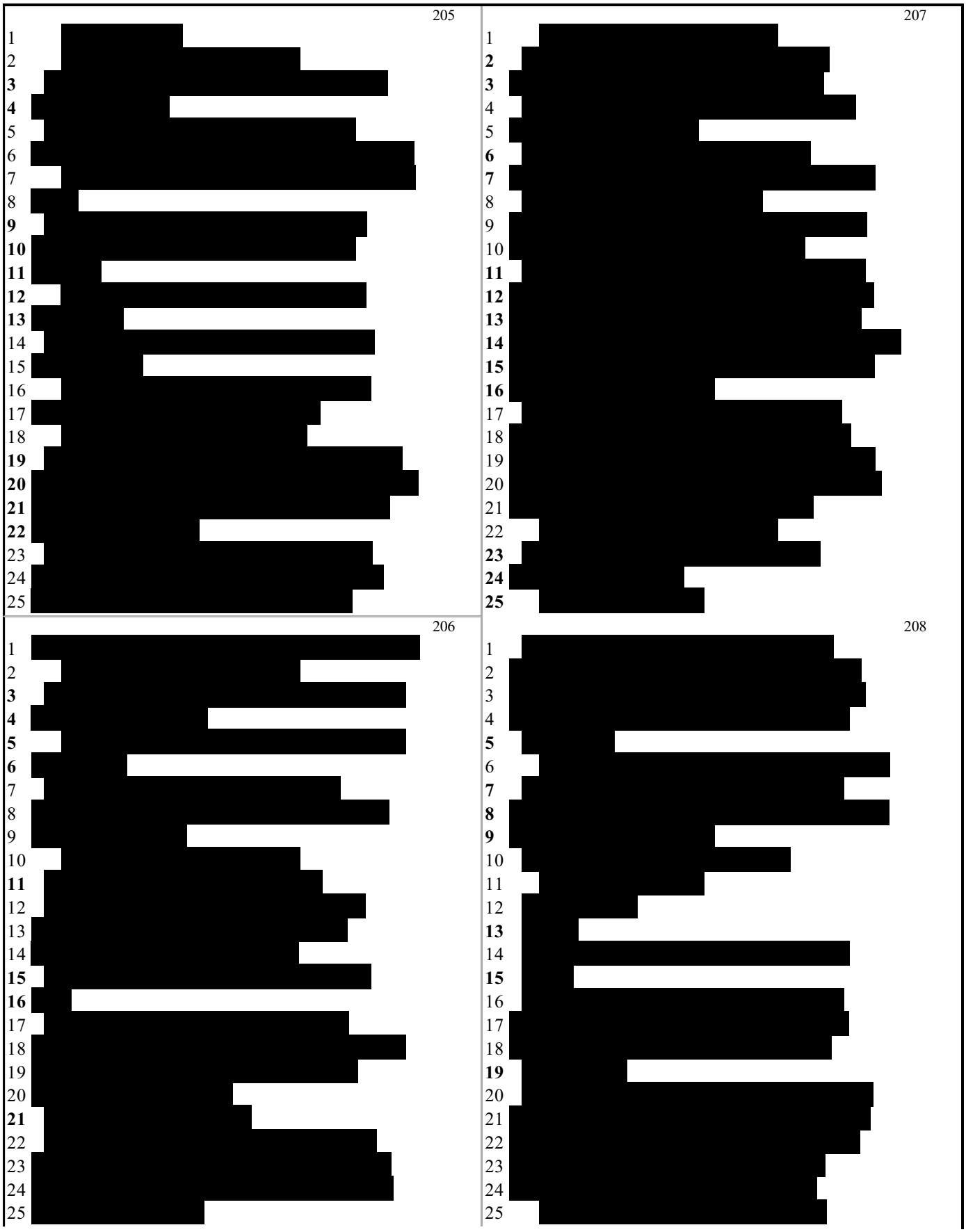
[redacted]

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[redacted]

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[redacted]



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MS. MEHTA: Let's go to the next exhibit, which will be Exhibit 23, Tab 24.
REMOTE TECHNICIAN: One moment.
(Exhibit 23 marked for identification.)
Q Okay. Mr. Draughon, you should have

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Exhibit 23 in front of you, and this is the

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