Exhibit E



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Transcript of Thomas Turvey, 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. 5:24-cv-03811-EKL
v. :
ANTHROPIC PBC, : Defendant. :
- - - - - - - - - - - - - x

Video-recorded Deposition of
ANTHROPIC PBC
By and Through Its Designated Representative
THOMAS TURVEY
New York, New York
Wednesday, November 5, 2025
9:13 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 - 135
Reported By: Anita M. Trombetta, RMR, CRR,
California CSR No. 14647

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Videotaped deposition of ANTHROPIC PBC, by and through its designated representative, THOMAS TURVEY, held at the offices of:

Wilmer Cutler Pickering Hale and Dorr LLP
7 World Trade Center
250 Greenwich Street
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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A P P E A R A N C E S

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ALSO PRESENT:

TIM KAMAL-GRAYSON, ESQ., ANTHROPIC
ENRIQUE CASAS, Videographer

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----------I N D E X----------
WITNESS - THOMAS TURVEY

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Exhibit 35	Document Entitled, Principles of Data Partnerships, Bates Anthropic_0000229152 Through 229152	109
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Exhibit 37	Content Vendor List, Bates Anthropic_0000217601	113

----------INSTRUCTION NOT TO ANSWER----------

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PROCEEDINGS

THE VIDEOGRAPHER: Here begins media number 1 in the videotaped deposition of Tom Turvey, in the matter of Concord Music Group vs. Anthropic, in the United States District Court for the Northern District of California, San Jose Division, Case Number 5:24-cv-03811-EKL.

Today's date is November 5th, 2025, and the time on the video monitor is 9:13 A.M. The videographer today is Enrique Casas representing Planet Depos. This video deposition is taking place at 250 Greenwich Street, New York, New York.

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

ATTORNEY MATERA: Bret Matera on behalf of Oppenheim + Zebrak, and the plaintiff publishers, and I'm joined by Jenny Pariser.

ATTORNEY TOMPROS: Louis Tompros of Wilmer Cutler Pickering Hale and Dorr LLP along with, by video my, colleague Christina Luo. And also along in person with Tim Kamal-Grayson from Anthropic, representing Anthropic, and also representing the witness.

THE VIDEOGRAPHER: The court reporter today is Anita Trombetta, representing Planet Depos, and the witness will now be sworn in.

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THOMAS TURVEY, called as a witness, having been first duly sworn by a Notary Public, was examined and testified as follows:

EXAMINATION BY ATTORNEY MATERA:

Q Good morning, Mr. Turvey.

A Good morning.

Q My name is Bret Matera, and I'll be taking your deposition today. I represent the plaintiff music publishers in this case.

Thank you for taking time out of your schedule to answer my questions. We appreciate it. Today is going proceed in two parts. The first part is your 30(b)(6) deposition. And after that, we will do your 30(b)(1) deposition. And I'll let you know when we switch over.

A Okay.

Q Okay. To begin, can you please state -- start by stating your name for the record?

A My name is Tom Turvey.

Q Okay. Mr. Turvey, have you been deposed before?

A I have.

Q In what matters?

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A Multiple matters. One for Anthropic. Several for a previous employer.

Q Who is that previous employer?

A Google.

Q And what was the matter that you were deposed in for Google?

A Multiple matters. There was a Google Books case, which lasted many years. There was a case regarding Google Play, some patents. There is a third one, which I'm having a foggy memory of that. But there were at least three.

Q Okay. And you've been previously deposed in the Barts v. Anthropic case, that's right?

A Yes, that's right.

Q How many times were you deposed in that case?

A Once.

Q Was the testimony that you gave in the Barts deposition truthful and accurate?

A It was.

Q Okay. So the following may sound familiar to you, but before we get started, I want to go over a few ground rules so today goes quickly and smoothly.

I'm going to ask you a series questions

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It's a combination.
Q Are you -- you mentioned crawl content from the web.
Are you involved in that process at all?
A No.
Q Of those methods you just described, what is Anthropic's most common method of obtaining data to train its AI models?
ATTORNEY TOMPROS: Object. Vague and outside the scope.
A My understanding is the majority of the content is from crawl, and then we augment from data that my team might acquire.
Q What percentage would you place on that augmentation that you described of the total data that Anthropic acquires?
ATTORNEY TOMPROS: Objection. Vague and scope.
A I don't know the answer to that.
Q Anthropic has never attempted to license song lyrics from plaintiffs in this case, correct?
ATTORNEY TOMPROS: Objection. Vague and scope.
You can answer.
A We have not attempted to license song

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lyrics from the plaintiffs, no.

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ATTORNEY TOMPROS: Objection. Calls for speculation.

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[redacted]

ATTORNEY TOMPROS: Object to the form. Vague.

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[redacted]

ATTORNEY MATERA: Okay. I'd like to introduce an exhibit here.

(Plaintiffs' Exhibit 27, marked for identification.)

Q I'm showing you what has been marked as Plaintiffs' Exhibit 27, which is a document that was produced to us with Anthropic Bates stamp 0000231225.

Mr. Turvey, do you recognize this document?

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A I do not.

Q It appears to be a meeting invitation with the subject, "Tim, Tom, Amit, Catchup on Data Landscape!"

Do you see that?

A Yes.

Q Do you recall -- strike that.

Who do you understand Tim, Tom, and Amit to be?

A Well, Tom I believe is me. Tim, I believe it Tim Palmer. And Amit I have to assume is Amit Desai.

Q Okay. Do you recall receiving this invitation?

A I do not.

Q Okay. It's dated February 29th, 2024, correct?

A It is.

Q And when did you begin working at Anthropic?

A Nine days earlier, so -- February 20th.

Q Any reason to believe that you did not receive this invitation?

A I have no reason to believe it.

Q Okay. You said Tim Palmer.

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Who is that?

A Tim Palmer was a consultant that Anthropic was using for content acquisition prior to me being employed.

Q Consultant from where?

A He was a Google employee and left Google and opened up a consulting firm, is my understanding.

Q So his own proprietary shop?

A Yes.

Q And Amit Desai, who is that?

A Amit was a person working in product when I joined.

Q What is product?

A The product organization.

Q Is that a department internal to Anthropic?

A Yes.

Q The invite says, "Chance to discuss/close out the initial data landscape and explore/discuss topics we may want to continue exploring together."

Do you see that?

A Yes.

Q And then there is a link to what appears