EXHIBIT 1

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Transcript of Joshua W. Dennis

Date: March 9, 2026
Case: Concord Music Group -v- Anthropic

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1

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION
Case No.
5:24-cv-03811-EKL-SVK

CONCORD MUSIC GROUP, INC., et al.,
Plaintiffs
vs.
ANTHROPIC PBC,
Defendant

VIDEOTAPED DEPOSITION OF JOSHUA W. DENNIS
Monday, March 9, 2026 9:02 a.m.
WilmerHale
60 State Street, Boston, MA 02109

Reported by:
Janet McHugh, RMR, CRR, CLR
JOB NO. 621067

2

March 9, 2026
9:02 a.m.

Videotaped deposition of JOSHUA W. DENNIS, held at the offices of WilmerHale, 60 State Street, Boston, Massachusetts, pursuant to Agreement, before Janet McHugh, a Registered Merit Reporter, Certified Realtime Reporter, Certified LiveNote Reporter, and a Notary Public within and for the Commonwealth of Massachusetts.

3

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ALSO PRESENT:
Karl Johnston, Anthropic (via Zoom)
Dimas Bardales, Videographer

4

INDEX

WITNESS DIRECT
JOSHUA W. DENNIS
By Mr. Tompros 8

EXHIBITS

Number Description Page
Exhibit 1 Expert Report of Joshua W. Dennis 10
Exhibit 2 Expert Opposition Report of Joshua W. Dennis 12
Exhibit 3 Expert Reply Report and Supplemental Report of Joshua W. Dennis 14
Exhibit 4 Expert Report of Dr. Shawn Shan 40
Exhibit 5 Expert Report of Professor Michael D. Smith 43
Exhibit 6 Supplement to December 19, 2025 Expert Opinion of Professor Michael D. Smith 47
Exhibit 7 Expert Reply Opinion of Professor Michael D. Smith 52
Exhibit 8 Expert Report of Dr. Ben Zhao 54
Exhibit 9 Reply Report to Expert Rebuttal Reports of Dr. Shan and Dr. Zhao 160

5

EXHIBITS

Number	Description	Page
Exhibit 10	Document Bates-stamped ANTH_SAMPLE000007786	166
Exhibit 11	Dennis rebuttal exhibits marked electronically	173
Exhibit 12	Document headed "Reply Exhibit 2 - Documents Considered (February 13, 2026)"	174
Exhibit 13	Document Bates-stamped Anthropic_0000024702 through -4755	233
Exhibit 14	Document Bates-stamped Anthropic_0000022171 through -2220	233
Exhibit 15	Document Bates-stamped Anthropic_0000006182 through -6186	252
Exhibit 16	First Amended Complaint and Demand for Jury Trial	255
Exhibit 17	Document Bates-stamped Anthropic_00000006196 through -6203	258
Exhibit 18	Document Bates-stamped Anthropic_0000037119 through	

6

EXHIBITS

Number	Description	Page
Exhibit 18 (Continued) -7120		263
Exhibit 19	Document Bates-stamped ANTH_SAMPLE000293475	267
Exhibit 20	Document Bates-stamped ANTH_SAMPLE000291792 through -1793	268
Exhibit 21	Document Bates-stamped Anthropic_0000524085 electronically marked	273
Exhibit 22	Supplement to Rebuttal Expert Report of Dr. Andrew Bray	281
Exhibit 23	Document headed "Stoneturn, How Stoneturn Accelerates Fact-Finding by 75% with Reveal ASK"	287

7

PROCEEDINGS

THE VIDEOGRAPHER: Here begins Media No. 1 in the videotaped deposition of Joshua Dennis in the matter of Concord Music Group, Inc. et al., versus Anthropic PBC in the United States District Court, Northern District of California, San Jose Division, Case No. 5:24-CV-03811-EKL-SVK.

Today's date is March 9, 2026. The time on the video monitor is 9:02. The videographer today is Isaac Weaver, representing Planet Depos, headquartered at 451 Hungerford Drive, Suite 400, Rockville, Maryland 20850.

This video deposition is taking place at 60 State Street, Boston, Massachusetts.

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

MR. TOMPROS: Good morning. This is Louis Tompros of Wilmer Cutler Pickering Hale and Dorr, LLP, along with my colleague Disha Patel, representing the defendant, Anthropic PBC.

MR. HOWELL: Good morning. My name is Keith Howell from Oppenheim + Zebrak on behalf of the music publisher plaintiffs.

THE VIDEOGRAPHER: The court reporter

8

today is Janet McHugh, representing Planet Depos. The witness will now be sworn.

JOSHUA DENNIS,

having been duly sworn, after presenting identification in the form of a driver's license, deposes and says as follows:

DIRECT EXAMINATION

BY MR. TOMPROS:

Q. Good morning, Mr. Dennis.

A. Good morning.

Q. You have given testimony at depositions before, right?

A. I have.

Q. Roughly how many times?

A. For depositions, I believe twice.

Q. And you've given testimony at trial before as well, right?

A. I have.

Q. Roughly how many times?

A. Certainly one was a jury trial and then there were two others that were during the COVID era and were part of bankruptcy proceedings, so directly with the judge. So I'm not sure if that counts as trial or not. But they're on my CV.

Q. And you understand you've taken an oath

77

Q. You didn't give them any instructions on that, right?
MR. HOWELL: Objection. Form.
A. Correct. As I've said, those particular records were identified for me.
Q. You did not direct the selection of those records in any way, right?
MR. HOWELL: Objection. Form.
A. I did not.
Q. You don't know whether search terms were used in connection with obtaining those records, right?
MR. HOWELL: Objection. Form.
A. I'm just trying to remember. I know at least with respect to Anthropic employees, I was aware of certain search terms. I don't believe I was aware of any search terms specifically that were used on the Claude sample records.
Q. You'll agree that the 5 million record set of sample records includes files that don't have anything to do with songs or lyrics, right?
A. I'm sorry. Ask that one more time.
Q. Sure. You'll agree that the sample records set includes records that does not -- that do not have anything to do with songs or

78

lyrics; right?
MR. HOWELL: Objection. Form.
A. Yes. There are records as part of the 5 million sample that are not song- or lyric-related. Agreed.
Q. And you don't know whether the 6,849 files that the lawyers for the publishers identified are the only song- and lyric-related records in the data, right?
MR. HOWELL: Objection to form. Asked and answered.
Go ahead.
A. I suspect there probably are. Dr. Bray identifies some that are not part of that sample set. So, again, to the extent there were more song- and lyric-related prompts and outputs, inclusion of those would only further increase the number of records in my analysis.
Q. But you, yourself, identified -- strike that.
The 6,849 files that publishers' lawyers identified are not representative of the sample records, correct?
MR. HOWELL: Objection. Form. Vague.
A. They are a subset of records that

79

are -- that are relevant to my analysis.
Q. The 6,849 files the publishers' lawyers identified are not representative of the sample records, correct?
MR. HOWELL: Objection. Form. Vague.
A. They were not chosen randomly. They were specifically chosen based on whatever criteria, and they are relevant to my analysis in that they relate to song- and lyric-related tasks.
Q. They may be relevant, but they are not representative. Correct?
MR. HOWELL: Objection. Form. Vague.
A. How are you using the term "representative"?
Q. You're familiar with the statistical concept of a representative sample, right?
A. Yes.
Q. The 6,849 files that publishers' lawyers identified are not a representative sample of the sample records. Correct?
MR. HOWELL: Objection. Form. Vague.
A. Again, they were not chosen at random. So they were not statistically representative in that way. But, again, they are examples of the

80

uses and examples of song-related tasks within the broader 5 million sample and within the broader Record Universe.
Q. They are not statistically representative in any way, correct?
MR. HOWELL: Objection. Form. Vague. Asked and answered.
A. I haven't endeavored to think about every conceivable way that something could be statistically representative.
Q. You cannot identify a single way in which the 6,849 files that the publishers' lawyers selected are representative of the sample records, correct?
MR. HOWELL: Objection. Form. Vague. Asked and answered.
A. That is not something I have attempted to think about, not part of my opinion.
Q. In your reply report, you reduced the number of records that you considered in your sample song records set. Right?
A. That is correct.
Q. You did not add any to the original 6,849, correct?
A. I did not.

241

to me about what was and was not included as part of those -- part of the records I reviewed, and I certainly reviewed the email address which I understood is one way, at least, that those types of accounts could be identified.

Q. And did you take any steps to verify that the records for Claude accounts associated with publishers' investigators were excluded?

MR. HOWELL: Objection. Form.

A. Again, I think it is the same answer, in that the records that were identified to me, the representation was that they did not include Anthropic employees, investigators, or counsel, the various categories I've noted here, listed here. And I was able to confirm that, in fact, the email address for all of the records I reviewed in terms of the sample song records and work-in-suit records had an email address of "Redacted."

Q. Did you review any prompts or outputs that publishers' investigators submitted?

MR. HOWELL: Objection. Form. Vague.

A. Not as part of my affirmative analysis, no.

Q. Did you ask for a list of all accounts

242

belonging to publishers?

MR. HOWELL: Objection. Form. Vague.

A. I don't know what you mean in that question. I'm sorry.

Q. Sure.

Did you ask for a listing of all email addresses belonging to publishers?

MR. HOWELL: Objection. Form. Vague.

A. No. I'm not sure what the purpose of that would be.

Q. Did you ask for a list of all email addresses belonging to publishers' counsel?

MR. HOWELL: Objection. Form. Vague.

A. No. Because, again, none of the records I reviewed had an email address other than "Redacted," so there would be no purpose to looking for or requesting email addresses that wouldn't be found.

Q. Did you ask for a list of all email addresses belonging to publishers' investigators?

MR. HOWELL: Objection. Form. Vague.

A. My answer would be the same. I didn't request it. I'm not sure of the purpose of doing so, what the purpose would be of that.

Q. Did you ask to have access to the

243

prompts that publishers' investigators submitted to Claude?

MR. HOWELL: Objection. Form. I'm going to instruct the witness not to answer regarding conversations he may have had with publishers' counsel.

If you want to answer outside the context of those conversations, you may do so.

A. Can you ask your question one more time?

Q. Sure.

Did you ask to have access to the prompts that publishers' investigators submitted to Claude?

MR. HOWELL: Same objection, caution.

A. I -- no. It would have been outside the scope of my assignment.

Q. Did you review any prompts that publishers' investigators submitted to Claude?

MR. HOWELL: Objection to form. Vague.

A. Not that I can think of as part of my affirmative analysis.

Q. Can you independently verify that all of the 851 work-in-suit records from the opening report came from users who were not employees or

244

investigators for publishers?

MR. HOWELL: Objection. Form. Vague.

A. Again, that would have been outside the scope of what I was asked to do in my assignment. What I was able to confirm, beyond the representation that was made to me, is that there was no indicia of that, based upon the email address field, which I understand was the way those type of accounts could potentially be identified.

Q. Can you independently verify all of the 814 work-in-suit records in your reply report came from users that were not employees of the publishers?

MR. HOWELL: Objection. Form. Vague. Asked and answered.

A. Ask your question one more time.

Q. Sure.

Can you independently verify that all of the 814 work-in-suit records selected -- strike that.

Can you independently verify that all of the 814 work-in-suit records that you analyzed in your reply report came from users that were not employees of the publishers?

MR. HOWELL: Objection. Form. Vague.

245

A. Again, you know, the identification was not part of my assignments in this case. That was my understanding based on the representation that was made to me. And what I was able to do is review the data I was provided with respect to the metadata, and specifically the email addresses in this case, and confirm that all those email addresses noted as "Redacted", as opposed to I understand I've seen other times when that email address may be an email address for counsel or for potential investigator. I've seen that in some of Dr. Bray's output.

Q. What email addresses for investigators have you seen?

MR. HOWELL: Objection. Form. Vague.

A. I certainly recall within Bray's output -- I don't remember the full email address. It was something guardian. I think that didn't appear to be a counsel, so my assumption is that would be an investigator. But, again, that was only based on reviewing some of the prompts and outputs that Dr. Bray identified as part of his analysis.

Q. Can you independently verify that all of the 814 work-in-suit records that you analyzed

246

in your reply report came from users that were not publishers' investigators?

MR. HOWELL: Objection. Form. Vague.

A. Again, that verification was not part of my assignment. That was something that was represented to me, as I stated in my report. However, that said, I did review, again, the metadata and information that was available to me with respect to the, I'll say, ownership of the accounts, at least relative to the email address, and confirmed that the email address associated with all of the records I reviewed in both my sample song records as well as my work-in-suit records had an email address of "Redacted" as opposed to potential email address indicating something like counsel or investigator or things of that nature or an Anthropic employee.

Q. Can you independently verify that all of the 814 work-in-suit records came from -- that you analyze in your reply report came from users that were not publishers' lawyers?

MR. HOWELL: Objection to form. Vague. Asked and answered.

A. Again, consistent with my response with respect to the other categories, as I stated in

247

my report, that was a representation that was made to me. Notwithstanding that representation I reviewed the information that was available to me in the form of the metadata, specifically, the email address, and confirmed that each of the records I analyzed as part of my sample song records and work-in-suit records had an email address of "Redacted" as opposed to an email address that would indicate some other source, such as a potential investigator or counsel or Anthropic employee.

Q. Do you know how the email address "Redacted" came to be listed on the email address for the records?

MR. HOWELL: Objection. Form.

A. I don't know the basis for how that was produced. Anthropic or counsel made those edits to the metadata.

Q. Can you independently verify that all of the 3,277 sample records came from users that were not employees of publishers?

MR. HOWELL: Form. Vague.

A. Once again, as I've explained here, and I think this section broadly relates to both my work-in-suit records and sample song records,

248

that was a representation that was made to me. And what I did to gain comfort with that representation was review the available metadata to me, focusing on email address and confirmed that the email address was noted as "Redacted" as opposed to an email address, in your example I think you said the counsel. But the same answer would go for not having an Anthropic employee address or potential investigator's email address. They all simply said "Redacted."

Q. Can you independently verify that all of the 3,277 sample records that you analyzed in your reply report came from users that were not publishers' investigators?

MR. HOWELL: Objection. Form. Vague. Asked and answered.

A. Again, the way I approached this, same as the work-in-suit records, as I described, was it was a representation to me about the population I was reviewing. And to gain comfort with that representation, I reviewed the metadata associated with this case, the sample song records, and confirmed that the email address, which I understood to be an identifier used to potentially identify things like employees or

249

investigators or counsel, all had an email address of "Redacted" as opposed to an e-mail address that was unredacted and indicated a potential other source.

Q. Can you independently verify that all of the 3,277 sample records that you analyzed in your reply report came from users that were not publishers' lawyers?

MR. HOWELL: Objection. Form. Vague. Asked and answered.

A. Again, consistent with the other categories and groupings, that was a representation that was made to me by counsel. Notwithstanding that representation, I reviewed the metadata associated with the sample song records and confirmed that the email address associated with those said "Redacted" as opposed to indicia of another source such as a specific unredacted email address, indicating a potential Anthropic employee, counsel, or investigator.

Q. To redact all of the publishers' investigators email addresses -- strike that.

To provide -- strike that again.

To redact only -- let me think this through.

Do you know whether Anthropic had a full list of

250

the email addresses used by publishers' investigators?

MR. HOWELL: Objection. Form. Vague. Speculation.

A. I don't know one way or the other and that would be outside of my assignment in this case.

Q. Let's imagine hypothetically that Anthropic did not have the full list of email addresses used by publishers' investigators.

Can you imagine that hypothetical?

MR. HOWELL: Objection to form.

A. I can envision that hypothetical.

Q. And that Anthropic redacted all email addresses except those that it was provided by publishers. Okay?

A. Okay.

Q. In that circumstance, a publishers' email address would appear as "Redacted" in the material that -- excuse me.

-- a publishers' investigator's email address would appear as "Redacted" in the set that you received, correct?

MR. HOWELL: Objection to form.

A. I don't know one way or the other what

251

their exact process was. I wasn't part of that. That was outside the scope of my assignment.

Q. Did you do anything to check the actual text of prompts and outputs to confirm whether the text of prompts that you analyzed corresponded to the text of prompts that publishers' investigators submitted?

MR. HOWELL: Objection to form. Vague.

A. First and foremost, that would be outside the scope of my assignment. I don't recall seeing data sufficient with which to perform that analysis regardless. And I certainly don't recall, as any of the prompts and outputs I reviewed, certainly it was never brought to my attention by the team, that there was a prompt or output that noted it being performed by an investigator. Certainly not within my affirmative analysis.

Q. Let's go to the exhibits to your opening report. I'm again going to ask you to look at the very small spreadsheet, specifically Exhibit 4 here, to your opening report.

A. I've got these turned around. Okay.

Q. Are you with me?

A. I think I'm at the beginning of

252

Exhibit 4 --

Q. Great.

A. -- to my opening report.

Q. Thank you. I'm going to ask you to go to page 14 of Exhibit 4.

Are you there?

A. I am on page 14 of 98 of Exhibit 4 to my opening expert report.

Q. At the bottom of the chart, the last row on that page, there is a record that has the Bates start indication, Anthropic, underscore, a bunch of zeros 6182.

Do you see that?

A. I do.

Q. And it's listed as "Record 132" in the number column.

Do you see that?

A. I do.

Q. The prompt there says "Write me a song about the death of Buddy Holly."

Do you see that? One of the prompts.

A. Yes. I see that was an excerpt that I extracted from this document.

(Document Bates-stamped Anthropic_0000006182 through -6186 marked

CERTIFICATE

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

I, Janet M. McHugh, a Registered Merit Reporter and a Notary Public within and for the Commonwealth of Massachusetts do hereby certify:

THAT JOSHUA DENNIS, the witness whose testimony is hereinbefore set forth, was duly sworn by me and that such testimony is a true and accurate record of my stenotype notes taken in the foregoing matter, to the best of my knowledge, skill and ability; that before completion of the deposition review of the transcript was requested.

I further certify that I am not related to any parties to this action by blood or marriage; and that I am in no way interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my hand this 13th day of March, 2026.



JANET M. MCHUGH
Notary Public

My Commission Expires:
July 16, 2028