EXHIBIT 3



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Transcript of Andrew Bray

Date: February 24, 2026
Case: Concord Music Group -v- Anthropic

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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CONCORD MUSIC GROUP, INC., ET AL., Plaintiffs, v. ANTHROPIC PBC, Defendant. Case Number 5:24-cv-03811-EKL SVK

HIGHLY CONFIDENTIAL--ATTORNEYS' EYES ONLY
VIDEOCONFERENCED and VIDEO-RECORDED
DEPOSITION OF
ANDREW P. BRAY, Ph.D.
San Francisco, California 94111
Tuesday, February 24, 2026

Reported Stenographically by:
MARY J. GOFF
CSR No. 13427
WA CSR No. 21030779
Job No. 620584
PAGES 1-225

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VIDEOCONFERENCED and VIDEO-RECORDED DEPOSITION of ANDREW P. BRAY, Ph.D., Volume I, taken on behalf of Plaintiff Publishers, Oppenheim + Zebrak, LLP, at WilmerHale, 50 California Street, Suite 3600, San Francisco, California 94111, beginning at 9:03 a.m. and ending at 4:10 p.m., on Tuesday, February 24, 2026, before MARY J. GOFF, California Certified Shorthand Reporter No. 13427 and WA CSR No. 21030779.

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Videographer: Justin Ramirez-Hale

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San Francisco, California 94111
Tuesday, February 24, 2026
9:03 a.m.

THE VIDEOGRAPHER: Here begins Media Number 1 in the videotaped deposition of Andrew Bray, in the matter of Concord Music Group, Incorporated, et al., versus Anthropic PBC, in the United States District Court, Northern District of California San Jose Division, Case Number 5:24-cv-03811-EKL (SVK).

Today's date is February 24, 2026. The time on the video monitor is 9:03 a.m. or -- yes. The videographer today is Justin Ramirez-Hale, representing Planet Depos.

This video deposition taking place at 50 California Street, Suite 3600, San Francisco, California.

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

ATTORNEY HOWELL: Keith Howell from Oppenheim & Zebrak on behalf of the Music Publisher Plaintiffs.

ATTORNEY PATEL: Disha Patel from Wilmer Cutler Pickering Hale and Dorr, counsel for Anthropic. And with me we have Louis Tompros, also

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from WilmerHale; and Natalie Naugle, counsel at Anthropic.

THE VIDEOGRAPHER: The court reporter today is Mary Goff, representing Planet Depos. The witness will now be sworn.

THE COURT STENOGRAPHER: My name is Mary Goff. I am a California Certified Shorthand Reporter, CSR Number 13427. Today's proceedings are being captured by stenographic means.

ANDREW P. BRAY, Ph.D.,
Being first duly sworn or affirmed to testify to the truth, the whole truth, and nothing but the truth, was examined and testified as follows:

EXAMINATION

BY ATTORNEY HOWELL:

Q Good morning.
A Good morning.
Q Could you please state your name for the record?
A Andrew Bray.
Q And do you prefer Dr. Bray? Professor Bray?
A Either is fine. Probably Dr.
Q And you understand you're here today to have your deposition taken, correct?

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A I do.
Q And it's -- it relates to the case "Concord v. Anthropic"?
A Correct.
Q Okay. And you submitted four reports in this case, correct?
A That's correct.
Q And you were retained by counsel for Anthropic?
A I was -- right. I was retained by WilmerHale to serve -- provide an opinion in this case.
Q And who drafted your four reports?
A I drafted the four reports -- let me back up.
The reports were made in response to questions provided to me by WilmerHale of areas that they wanted me to look into and render opinions on. This had to do with lyric regurgitation.
I devised a method of analysis and conducted the analysis and drafted the reports. And some of the drafting I directed counsel to assist with, and they assisted with that drafting.
And then I would review their drafts and revise anything that I disagreed with. And then I

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reviewed the extent of the reports before signing them.
Q Okay. Other than counsel for Anthropic, did anyone else assist you in drafting your reports?
A So in the drafting of the reports, it was -- there were no others involved. But indirectly, there were others involved that informed the reports. There were other expert witnesses in the case that I spoke to on occasion.
And for about one month I worked with a research associate who helped with the computing side of things. This was from about -- this was during January.
Q And did that research associate contribute any language to any of your reports?
A He did not.
Q And what's their name?
A Calvin Carter.
Q And which portions of your reports did counsel draft?
ATTORNEY PATEL: Objection, mischaracterizes the witness's testimony.
Q (BY ATTORNEY HOWELL) You can go ahead.
A So the drafting of the reports was done jointly in terms of the original draft, the

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A Was -- could you remind me? Is Dr. --
Q He's an expert for -- retained by Anthropic.
A I may have, but I don't recall having done so now. And on a cursory review of my reports, I can't find any reference to that.
Q And no opinions regarding Dr. Altman's analysis come to mind?
A None come to mind.
Q And Dr. Lustig performed an analysis of a sample of the records that Dr. -- sorry -- that Mr. Dennis reviewed.
Did you assess the sufficiency of that sampling method performed by Dr. Lustig?
A This -- it would be -- it would be helpful if I had Dr. Lustig's report so I could review the description of the sample. So I guess without that description of the sample, I -- I'm unsure -- or -- or yeah, I wouldn't want to voice a strong opinion.
Q Do you recall reviewing that section of --
A I do --
Q -- Dr. Lustig's report?
A -- yeah.
Q And you didn't include any opinions regarding that analysis in any of your reports,

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correct?
A I believe that's the case.
Q And prior to this case in your professional career, have you ever been asked to assess whether a document contains a request for lyrics?
A Not to my knowledge, no.
Q And prior to this case in your professional career, have you ever been asked to assess whether something contains regurgitation of lyrics?
A Not to my knowledge.
Q And your affirmative analysis -- so I'm referring to your opening report and your reply -- you analyze prompts and outputs that came from the Claude sample; is that right?
ATTORNEY PATEL: Objection, vague.
A Can you please restate the question?
Q (BY ATTORNEY HOWELL) You understand that Anthropic produced a sample of five million records containing Claude prompts and outputs in this case, correct?
A My understanding -- yes, my understanding is that Anthropic produced, pursuant to a court order, a set of five million records, and those

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files were the subject of my analyses.
Q And I think you called those five million records "the sample" in your report; is that fair?
A I believe that's true.
Q If I refer today to "the sample," will you understand that I'm referring to those five million records?
A Yes.
Q All right. And in your affirmative analysis, you rely on prompts and outputs that come exclusively from the sample, correct?
A I believe so, yes.
Q And we already mentioned there's five million records in the sample, correct?
A That's correct.
Q How many of those records did you personally read?
A Here I would have to estimate and ask: Do you mean read in full? Read the part?
Q Let's start with "read in part."
A I would put it on the order of magnitude of hundreds, although that's an estimation.
Q Okay. And "read in full," how many would you estimate in read in full?
A I would say less than a half of that, but

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probably still hundreds.
Q And when you say "hundreds" for "read in part," what -- is that something under a thousand; is that fair?
A That would be my guess --
Q All right.
A -- under a thousand.
Q And let's see. And you understand that sample came from a wider universe of records?
A That's my understanding.
Q And that covers -- and that universe covers the same time period?
ATTORNEY PATEL: Objection, vague.
Q (BY ATTORNEY HOWELL) It is vague. I'll set it up.
The sample records all come from September 22, 2023 to March 22, 2024, correct?
A Correct.
Q Okay. And those sample records come from a wider universe of records covering that same time period, correct?
A Just one moment, please.
Q Paragraph 16 might be helpful. That refers to the metadata in the universe.
A Great. So this states the -- paragraph 16

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the regular expression matched to, but that clearly do not -- were not in this case seeking any amount or form of lyric regurgitation.

Q And so you -- you recognize that there are false positives in the list of files that match your regular expression?

A That's correct.

Q You didn't remove those files from the list of documents that you found to be responsive to each research question correct?

A That's correct. They remain in the -- in the collection of documents that were responsive to that regular expression.

Q Why wouldn't you remove false positives?

A The approach that was used here is a standard approach in building a classifier model.

Whenever you're building a classification model -- a two-class classification model, there's the possibility that that classifier will generate false positives. There's the possibility it'll generate false negatives.

It's, in many cases and certainly in this case, impossible to write a classifier -- realistically write a classifier that could do perfect sorting that wouldn't have either false

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positives or wouldn't have false negatives, so the question then becomes: How flexible should my model be -- work -- can I build a model? And here by "model," I mean the regular expression that will capture the -- the sort -- sort of text documents that I'm seeking without incurring too many false positives.

And so it's trying to balance the -- as proportions, these are the recall and the precision of the classifier, in this case thinking about just having a balance of false positives and false negatives.

Q Do you have a sense for how many false positives there are in your set of documents for Research Question 1?

A I haven't reviewed enough of them to have kind of a systematic estimate. I would -- I think it's fair to say just many of the documents are false positives.

Q Can you provide any more precision regarding what percentage of the records you found to be responsive to Research Question 1 you considered to be false positives?

A I wouldn't provide any more precision. It was based on a spot-check and the determination that

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indeed there were still false positives in the -- you know, upon seeing false positives, there's the option of making the regular expression less flexible.

So the original regular expression was not very flexible. It had only matched to a few very explicit types of files. And the goal here was to have a classifier that had high precision, which is to say of those that we were classifying as positive, we wanted to be sure that a high proportion of them were positive.

The second stage -- and this is what describes the refinement of the regular expressions -- this was to address the recall side of the equation. So initially the model was built to be kind of deliberately strict, knowing that it would be excluding certain ways that people would, you know, write down a -- when they're seeking any amount or form of lyric regurgitation, knowing that we are -- you know, there are more subtle forms of asking for -- more indirect forms of asking for it.

And knowing that we would miss those in the original regular expression, I had Claude -- we can get into this more explicitly, if you would like -- surface examples of these false negatives

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that allowed me to find ways that I could broaden that regular expression.

So it's a -- you have these competing forces. You have -- if you have a lot of false positives, there's a -- kind of a need to constrain your regular expression, make it a little bit more strict. If you have it too strict, you are going to be having more false negatives, and so there was a back-and-forth trying to determine the -- the -- kind of the Goldilocks zone here of regular expression that was just the right level of flexibility that would capture most of the text documents that were seeking any amount or form of lyric regurgitation without inducing a flood of false positives.

Q Do you have a sense for the false positives rate for Research Question Number 2?

A So Research Question 2 is looking at those that were responsive to Research Question 1 and then further refining kind of what it was looking for. It's looking for the, I believe it's, song title or artist.

And if -- if it found those within particular parameters of the regular expression, it was responsive. In terms of the -- the -- similarly

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Q And for Question 1, did you distinguish between partial and full requests for lyrics?
A One moment. Could you -- I'll find it. Let me just get to my opening report.
ATTORNEY PATEL: For that pending question, objection, vague.
A Here we go. Okay. To the part of my report that references this, could you ask your question again?
Q (BY ATTORNEY HOWELL) Sure.
Did you Research Question 1 distinguish between partial and full requests for lyrics?
ATTORNEY PATEL: Objection, vague.
A So the text of the research question is "what percent of prompts seek any amount or form of lyric regurgitation," and the regular expressions reflect that.
Q (BY ATTORNEY HOWELL) So you were seeking to capture both partial and full requests for lyrics?
ATTORNEY PATEL: Objection, vague.
A I was seeking to capture any amount or form of lyric regurgitation.
Q (BY ATTORNEY HOWELL) Is that -- sorry.
Is that different from what I said?

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A Yes. So I believe you just said "lyrics" and not "lyric regurgitation."
Q Okay. So thank you.
So were you seeking to capture both full and partial request -- requests for lyrics regurgitation?
A Yes, any amount or form of lyric regurgitation.
Q Okay. And in your analysis, did you identify any true positives that -- relating to Question 1 that Mr. Dennis didn't find?
ATTORNEY PATEL: Objection, vague.
A Yeah, could you state your question again? So I'll let you...
Q (BY ATTORNEY HOWELL) Sure. As part of your -- or strike that.
You're aware that Mr. Dennis also assessed whether records contained requests for lyrics?
A I believe he had a different definition than the definition than I operated under.
Q But you understand he was also looking at requests for lyrics -- lyrics to songs?
A I interpret Mr. Dennis's approach as him being provided with a set of documents that contained references to lyrics and songs. And his task was to taxonomize those and categorize them into different ways that users in this particular subsample of documents that he has provided, how he would categorize their behavior.

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Q And did you identify any true positives responsive to your Question 1 that Mr. Dennis didn't consider?
ATTORNEY PATEL: Objection, vague.
A So here when you say "Mr. Dennis did not consider," my -- I'm not sure what -- what do you mean by "his consideration"?
So his -- it -- because he looked at several datasets. There was some overlap between them. So I guess it would be helpful if --
Q (BY ATTORNEY HOWELL) Sure.
A -- you could tell me precisely which analysis of his you're referring to.
Q Sure. Did you identify any true positives responsive to your Question 1 that were not in the group of records from the sample that Mr. Dennis analyzed?
ATTORNEY PATEL: Objection, vague.
A So here are you referring to -- he has an Exhibit 5 that's a set of 6,849 that he purports were drawn from the five million sample -- selected for him from the five million sample.
And is your question whether one of my true positives -- so a document that was in the numerator of the proportions that are provided in Section 1 -- whether or not one of those true positives was a part of his 6,849, his Exhibit 5?

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Q (BY ATTORNEY HOWELL) Are you aware of any true positive that was not included in that set of --
A Ah --
Q -- 6,000?
A -- I -- I didn't -- didn't perform that analysis.
Q But sitting here today, you're not aware of any particular document that meets that criteria?
A I -- I didn't run that analysis.
Q How did you design your initial regular expression for Question 1?
A Let me go to the original.
So the original regular expression, it was informed by the research question, which is to say the prevalence of prompt seeking any amount or form of lyric regurgitation, just kind of a sense of what that would look like.
And then also the first phase of my data

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So as I read the -- you know, "any percent of prompts, any amount or form of lyric regurgitation," I guess I would have to look at a particular example. If you could provide one, I could say whether or not kind of I would consider that responsive to Question 1 or not and then what -- that's one question. And whether or not the regular expression should have caught it.

There may be examples in Dennis's report -- Mr. Dennis's report.

Q Okay. I guess I'm talking about what you were attempting to capture. If someone said, "Write me a new song in the style of Katy Perry," that's not a request that you were attempting to capture with any of your regular expressions, correct?

A One moment. Let me review how I describe this. I think the clearest statement is in paragraph 96. For Question 1, I was asked to:

"Assess what percentage of total prompts in the adjusted sample included a user asking Claude to give -- send or provide any amount or form of lyrics to an existing song."

Q (BY ATTORNEY HOWELL) So regarding my

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question about a request for a new song in the style of Katy Perry, that was not something that you were attempting to capture in your regular expression?

A So the -- I mean, the regular expressions were trying to capture precisely what's stated here, "total prompts, including the -- to give short -- any amount or form of lyrics to an existing song."

Q And "existing song" would not include a new song in the style of a particular artist, correct?

A I guess I can imagine new songs that share no lyrics. You know, you can have a song -- "write me a song inspired by Katy Perry," and it has not a -- you know, the lyrics look nothing like a song to Katy -- of Katy Perry.

I can imagine kind of another one that is principally regurgitating Katy Perry, but with, you know, very superficial changes. And that latter example where the kind of creative work is regurgitating lots of lyrics to the existing song, then I would consider that responsive to Question 1.

Q That may be -- well, that might be responsive to your Questions 3 and 4, correct?

A Sorry. You're correct on the seeking side.

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Q But the actual request itself for a song -- "a new song in the style of an existing artist," that was not something you were designing your regular expressions to capture -- I should say regular -- your regular expressions for Questions 1 and 2; is that fair?

A That's fair. I think it could capture such a thing because of the flexible word buffer, but the goal was to capture users who are explicitly seeking any amount or forms of lyric regurgitation to an existing song.

ATTORNEY HOWELL: Okay. Let's take our next break.

ATTORNEY PATEL: Sounds good.

THE VIDEOGRAPHER: Stand by. The time is 12:42 p.m. We are going off the record.

(A break was taken from 12:42 p.m. to 1:28 p.m.)

THE VIDEOGRAPHER: The time is 1:28 p.m. we're back on the record.

Q (BY ATTORNEY HOWELL) Welcome back.

A Thank you.

Q Previously we were discussing the Claude refinement analysis you performed?

A Right.

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Q You used Claude Haiku 4.5 for that analysis, correct?

A I believe that was the model.

Q Do you -- who selected that model?

A Let me just pull to that section.

Q It should be paragraph 34 of your opening report, I should say.

A Right. So yeah, it was Claude Haiku 4.5, and I selected that model.

Q Okay. Why did you select Claude Haiku 4.5?

A There were a variety of reasons. I guess Claude generally, its different versions are one of the frontier models that I would expect would have the best general behavior.

Given the -- the parties in the case, I -- you know, ordinarily using a large language model involves sending information to the company server. I was worried that other large language models wouldn't be permissible given the sensitivity of the data.

But then within the class of Claude models, there are many. And Haiku 4.5, I believe -- I believe when I ran this, it was the latest version of 4.5. And in the description -- sorry. It's the

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"Prompt Created Date CF."
And then if I were interested in finding all the files with the "Prompt Created Date CF" that fell in a particular window on a particular day, I would search across the entirety of the five million sample. I wouldn't do a sequential pre- and post-suit search.
Q (BY ATTORNEY HOWELL) Okay. You mentioned Mr. Dennis assessed the -- a subsample from the sample provided by Anthropic, correct?
ATTORNEY PATEL: Objection, vague.
A Yeah, so which dataset are you referring to? He looked at several.
Q (BY ATTORNEY HOWELL) Yeah, his assessment of the sample records.
A Right, so the way he calls the sample song records? Yeah, I understand that the -- what he calls the "sample song records" are kind of a deliberately nonrepresentative sample of 6,849 files selected from the five million sample by counsel and provided to him.
Q And do you agree that to the extent Mr. Dennis was correct in his categorizations, that the number of documents falling into each of those categories could only have increased if he had

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reviewed the entire sample?
ATTORNEY PATEL: Objection, vague; and calls for speculation.
A Yeah, so I guess maybe I can answer your question like this: That -- he has a method for categorizing documents, say, that fall into Prompt Category 1. And this method, as he attests, is not foolproof. It has its own errors.
And as Dr. Lustig attested, even Mr. Dennis's attempt at rectifying errors itself had errors. But if I entertain the hypothetical that he could have a perfect classifier -- like, if the ground truth were known, which it is not; if the -- he had access to the ground truth or a classifier that perfectly reflected the ground truth, which he clearly does not and doesn't claim to -- then by looking over more than 6,848 -- 9 files, that -- whatever number he finds fitting Prompt Category 1 will either stay the same or increase.
Q (BY ATTORNEY HOWELL) And if Mr. Dennis were correct about the number of records in the sample falling into each of the categories he assessed, do you have any other issues with his extrapolation of those -- of those findings from the sample to the record universe?

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ATTORNEY PATEL: Objection, vague; and calls for speculation.
A Yeah, I do have reservations about his extrapolation.
Q (BY ATTORNEY HOWELL) Okay. And what are those reservations?
A So I think -- you got to the first one that -- the number from which he would be extrapolating. Say the total count that he found responsive to a particular prompt or output category. That -- that number itself is subject to error due to the classification process.
The primary problem is that the way that he was looking for evidence of kind of expressions of a prompt that had a particular criteria was he would search the entirety of the extracted text -- text field. And doing so is actually looking over far more files than -- sorry. Let me back that up -- far more individual prompt output pairs than five million.
And so any extrapolation based on that will have quite a bit of overcounting, and so consequently, the extrapolation will also be subject to this issue with overcounting.
Q Have you had a chance to review

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Mr. Dennis's reply report?
A I have.
Q Do you understand that -- this issue of looking at something other than the last prompt and output, that he has addressed that issue in his reply report?
ATTORNEY PATEL: Objection, vague.
A Yeah, I see -- and this is just from memory. I could be more precise if I had his reply. But I recall he cites -- I can probably find it -- my critique of his extrapolation. And so let me see if I can find that. Maybe page 17. Okay. So yeah:
"If the sample was selected by searching the full text of the five million files and Mr. Dennis searched over the entire contents of his 6,849 text files, then this would have had the effect of searching over many, many more than five million files. As a result, the appropriate sampling ratio that he used would be far higher than .053 unless the extrapolated figure would be much lower. Mr. Dennis's fundamental error here is ignoring

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identifier of a file, and yet we see examples where we have two files.

The LogID is the exact same. The text content is the exact same. So there was some other process that happened at some point in the kind of data storage data collection process that had another source of data duplication.

Q (BY ATTORNEY PATEL) What does the appearance of multiple copies of prompt output pairs in a sample tell you about whether the record universe includes at least one separate record for every prompt and output submitted to Claude?

ATTORNEY HOWELL: Objection, form.

A So based on my understanding of the court order, the five million sample that I looked at was a simple random sample of 2.5 million from the presuit -- from the record universe in the presuit period and 2.5 million from the record universe in the post-suit time period.

And if it's a simple random sample, then you would expect that it should be representative of the population, the superset from which it was drawn.

So in my sample I observed that records could be -- prompts could be duplicated by any of

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those three mechanisms -- the LogID duplication, the title record duplication, and the nesting process. So it's -- so it's -- based on that understanding, those all -- each one of those three types of files should exist in the record universe as well.

And kind of my understanding of the record universe also is built by just my understanding of the way that LLMs work, that they, at least in this time period, had this stateless characteristic where every prompt that was sent included all of the previous prompts.

So I would just expect that any database that they have that's storing all these interactions should be storing them in this nested structure.

ATTORNEY PATEL: Okay. No further questions from me.

ATTORNEY HOWELL: No questions from me. Thank you, Dr. Bray.

THE VIDEOGRAPHER: This -- stand by. This ends the videotaped deposition of Dr. Andrew Bray. The time is 4:10 p.m. We are going off the record.

(TIME NOTED: 4:10 p.m.)

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I, ANDREW P. BRAY, Ph.D., do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this_____ day of_____, 20____, at_____, _____.
(City) (State)

_____
ANDREW P. BRAY, Ph.D.

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I, MARY J. GOFF, CSR No. 13427, Certified Shorthand Reporter of the State of California, certify;

That the foregoing proceedings were taken before me at the time and place herein set forth, at which time the witness declared under penalty of perjury; that the testimony of the witness and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed under my direction and supervision; that the foregoing is a full, true, and correct transcript of my shorthand notes so taken and of the testimony so given;

That before completion of the deposition, review of the transcript (XX) was ( ) was not requested: ( ) that the witness has failed or refused to approve the transcript.

I further certify that I am not financially interested in the action, and I am not a relative or employee of any attorney of the parties, nor of any of the parties.

I declare under penalty of perjury under the laws of California that the foregoing is true and correct, dated this 26th day of February, 2026.

Mary J. Goff
_____
MARY J. GOFF