EXHIBIT E



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Transcript of Colin Stokes

Date: March 6, 2026
Case: Concord Music Group -v- Anthropic

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

CONCORD MUSIC GROUP, INC., ET AL, * Plaintiffs, * VS. * ANTHROPIC PBC, * Defendant. *

CIVIL ACTION
NO.: 5:24-cv-03811-EKL
SVK

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ORAL AND VIDEOTAPED DEPOSITION OF

COLIN STOKES

MARCH 6TH, 2026

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ORAL AND VIDEOTAPED DEPOSITION OF COLIN STOKES, produced as a witness at the instance of the PLAINTIFFS, and duly sworn, was taken in the above-styled and numbered cause on the 6th of March, 2026, from 9:03 a.m. to 3:22 p.m., via Zoom, before Tammy Staggs, CSR in and for the State of Texas, reported by machine shorthand, at the Springhill Suites by Marriott Denton, 1434 Centre Place Dr, Denton, Texas, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the

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record or attached hereto. That the deposition shall be read and signed under penalties of perjury. That the deposition shall be read and signed before any notary public.

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MR. GRUBOW: Object to the form.
A. I'm happy to take your word for that. But the -- the important point I'm making is that it's important to contextualize how lyrics are used in music, which was a main assignment, a main thing I was asked to opine on in this case.
To contextualize how lyrics are -- are used in music, we have to get a baseline understanding of what the components of a musical composition are. And that's exactly why I discuss music without lyrics. It has nothing to do whether all the works-in-suit use lyrics or not. It's to gain a baseline understanding of the -- of the language of music, which I do in this -- let's see -- which I offer in this Section 3 of my first report.
Q. (BY MR. KING) Do you understand it to be a contested -- do you understand the Plaintiffs ever to have alleged in this case that lyrics are the only portions of a musical compensation, that there are no other musical elements?
MR. GRUBOW: Object to the form.
A. I'm happy to return to paragraph 10 where I detail my understanding of the allegations as they pertain to -- to my assignment in this case.
My understanding is that those allegations

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are that Plaintiffs allege Defendant's infringement of copy written -- copyrighted works in the development and use of its genAI products. And they allege that the Defendant -- what was it -- copied and disseminated Plaintiffs' works, including lyrics.
Q. (BY MR. KING) Let me ask you something. You -- don't you think that your average lay listener understands that music has different components? It might have lyrics. It might have melodies or rhythms. People generally understand that, correct?
MR. GRUBOW: Objection to the form.
A. In my work as an adjunct instructor at Dallas College, I teach music appreciation. The -- which is a require -- acquired -- required common core -- I don't know if I have the exact correct terms for Texas education system, but it's a required course at that college.
And one of the things we cover with these students are the basic elements of a music composition. And I can tell from many of my students, they -- they haven't considered these specific components of musical composition before. So I would say the answer to your question is no, not always.
Q. (BY MR. KING) Do you think your average lay listener understands that there are some songs that have

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lyrics and some that don't?
MR. GRUBOW: Objection to the form.
A. I believe an average listener listening to a song would be able to tell if there are lyrics or not.
Q. (BY MR. KING) Right. And an average listener understands that lyrics are words often sung by a singer and that there's other music besides what they're hearing vocalized by music, right?
MR. GRUBOW: Objection.
Q. (BY MR. KING) Modern popular music as an example.
MR. GRUBOW: Objection to the form.
A. Again, I believe, yes, insofar as an average listener can differentiate between a human voice and what's not a human voice. But I don't think an average listener necessarily has a knowledge of -- of how lyrics are set in music and the important emotional and narrative value that lyrics derive from their musical setting.
Q. (BY MR. KING) Let's look at paragraph 17A of your report, Stokes Exhibit Number 3. This falls under a heading which is the summary of the conclusions you reach in this report. Right? Let's look at the second sentence of paragraph 17A.
You say, (as read): Lyrics can be a

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meaningful part of a composition but derive much of their value and expression from their setting within the rest of the musical composition and take on particular meaning when paired with melody, harmony, instrumentation, and other compositional elements.
So the first part of that opinion is that lyrics can be a meaningful part of a composition. What do you mean by "meaningful"?
A. Of course lyrics can be a meaningful part of a composition. If -- if text didn't have meaning, we wouldn't be able to have this conversation. So I'm saying that while lyrics can be a meaningful part, they derive much of their narrative and emotional value from the particular ways they're paired with these musical elements that I lay out. And I -- I -- I believe I give many examples of -- of how this works --
Q. We'll get to that.
A. -- in Section 3. I'm still answering.
For example, the -- the -- the perceived valence of specific types of chords. Minor -- quiet minor chords -- so I'm talking about dynamics and harmony here. Quiet minor chords can be -- are perceived as -- as sad or vulnerable. Whereas loud minor chords can be perceived as -- as angry.
Then the same -- same thing goes for --