

EXHIBIT 41

Public Redacted

Thomas Turvey

Andrea Bartz, et al. vs.
Anthropic PBC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANDREA BARTZ, et al.,)
)
Plaintiff,) Case No.:
) 3:24-CV-05417-WHA
v.)
)
ANTHROPIC PBC,)
)
Defendants.)
_____)
)

VIDEOTAPED DEPOSITION OF THOMAS TURVEY

April 10, 2025

9:09 a.m.

REPORTED BY:

Tammy Moon, CSR No. 13184, RDR, CRR

JOB NO. 10162277

Thomas Turvey

Andrea Bartz, et al. vs.
Anthropic PBC

1 APPEARANCES:

2 FOR PLAINTIFF ANDREA BARTZ, et al.:

3 SUSMAN GODFREY LLP

BY: ALEJANDRA SALINAS, ESQ.

4 BY: COLLIN FREDRICKS, ESQ.

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7 FOR DEFENDANT:

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11

12 ALSO PRESENT: JAKE MILLER, ESQ.

13 TIM KAMAL-GRAYSON, ANTHROPIC

14 J. CRAIG SMYSER (REMOTE)

15 RACHEL GEMAN (REMOTE)

16 NEIL GEORGE, THE VIDEOGRAPHER

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THOMAS TURVEY

Thursday, April 10, 2025

Tammy Moon CSR No. 13184, RPR, CRR

WITNESS: THOMAS TURVEY

EXAMINATION

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MS. SALINAS

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1 Thursday, April 10, 2025, 9:09 a.m.

2 THE VIDEOGRAPHER: We are now on the
3 record. Today's date is April 10th, 2025, and the
4 time is 9:09 a.m. This is the video-recorded
5 deposition of Tom Turvey being taken in the matter
6 of Andrea Bartz et al. v. Anthropic PBC. Case
7 number is 3:24-CV-05417-WHA.

8 My name is Neil George. I am the legal
9 videographer. The court reporter today is Tammy
10 Moon. We are both representing Aptus Court
11 Reporting.

12 Counsel will now state their appearance for
13 the record.

14 MS. SALINAS: Alejandra Salinas, from
15 Susman Godfrey, on behalf of the plaintiffs.

16 MR. FARRIS: Good morning. Joe Farris,
17 with Arnold & Porter, on behalf of Anthropic. I'm
18 also here with in-house counsel from Anthropic Tim
19 Kamal-Grayson.

20 THE VIDEOGRAPHER: Will the court reporter
21 please swear in the witness.

22 THOMAS TURVEY,
23 called as a witness, having been duly sworn,
24 testified as follows:

25 THE WITNESS: I do.

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1 THE REPORTER: This is Tammy Moon,
2 Certified Stenographic Reporter 13184. I am a
3 code-compliant reporter, and as such, this
4 transcript will be handled pursuant to the Code of
5 Civil Procedure 2025.550.

6 EXAMINATION BY MS. SALINAS, COUNSEL FOR PLAINTIFF

7 MS. SALINAS:

8 Q. Please state your name for the record.

9 A. Thomas Turvey.

10 Q. Good morning, Mr. Turvey.

11 A. Good morning.

12 Q. My name is Alejandra Salinas. And as you
13 just heard, I'm an attorney for the plaintiffs.
14 Have you ever been deposed before?

15 A. I have.

16 Q. How many times have you been deposed?

17 A. Three, I believe.

18 Q. Three times. Do you recall the names of
19 the cases that you were deposed in?

20 A. The names, I don't. I'm familiar with the
21 matters.

22 Q. That's fine.

23 A. A Google Books case. There's an e-book
24 suit involving Play e-books -- separate suit. And
25 then there was a separate Play case around patents.

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1 A. I do not.

2 Q. How much is Anthropic willing to pay for a
3 book to license from [REDACTED]?

4 A. That's interesting. It would depend
5 greatly upon the category of the book. We have an
6 understanding and valuation model that accounts for
7 category, and it might be -- fits within the -- the
8 category.

9 There's some unit cost there that is an
10 upper bound that we might be willing to pay. So it
11 would depend on which category and, you know, what
12 the valuation model implies.

13 Q. What's the upper bound of what you are
14 willing to pay per book?

15 A. For individual books, you are asking?

16 Q. Yes.

17 A. For an individual book, the valuation model
18 that we use most frequently cites [REDACTED]

[REDACTED]. I believe per book, it was
20 around, my memory, [REDACTED], I believe.

21 Q. So the most Anthropic is willing to pay to
22 license a book for LLM training is [REDACTED]?

23 A. No. What I'm letting you know is that
24 there's a valuation model that we use for [REDACTED]
25 [REDACTED], and that is the model that we would then

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1 theoretically use for other kinds of book
2 acquisition. And that model has the [REDACTED]
3 [REDACTED] being worth it to us around [REDACTED] last time
4 I looked.

5 Q. How did you get to that [REDACTED] figure?

6 A. It is an individualized unit cost based
7 upon a rather complicated formula that I am not
8 fully in the weeds on. But between finance and
9 compute cost research, the, you know, third-grade
10 version is [REDACTED]
11 [REDACTED] has a cost to it.

12 And then that is divided by the amount that
13 we might be willing to pay for estimates of relative
14 value for different content formats. And then
15 that's -- there's a multiplier.

16 Q. How do you determine what that denominator
17 is of, like, the -- sounds like you are attributing
18 some amount of money you are willing to spend to [REDACTED]
19 [REDACTED]. How do you determine what
20 that number should be?

21 A. Yeah. The folks that did the math there
22 would be better equipped to answer that, but it's
23 basically the cost -- my understanding is it's the
24 cost that -- to [REDACTED]
25 [REDACTED]. And there's

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1 STATE OF CALIFORNIA)
)
2 COUNTY OF SACRAMENTO)

3 I, TAMMY MOON, CSR No. 13184, Certified
4 Shorthand Reporter, do hereby certify:

5 That prior to being examined, the witness
6 in the foregoing proceedings was by me duly sworn to
7 testify to the truth, the whole truth, and nothing
8 but the truth;

9 That said proceedings were taken by me in
10 shorthand and thereafter transcribed into
11 typewriting under my direction and supervision;

12 That I am neither counsel for, nor related
13 to, any party to said proceedings, nor in any way
14 interested in the outcome thereof.

15 I further certify that I am not a party to
16 any stipulation, if made, that would waive my duties
17 mandated by the Court Reporters Board of California.

18 In witness whereof, I have hereunto
19 subscribed my name.

20 Dated: 13th of April, 2025

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23



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Tammy Moon, CSR No. 13184, RDR, CRR

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