

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

UMG RECORDINGS, INC., CAPITOL  
RECORDS, LLC, SONY MUSIC  
ENTERTAINMENT, ATLANTIC  
RECORDING CORPORATION, ATLANTIC  
RECORDS GROUP LLC, RHINO  
ENTERTAINMENT LLC, THE ALL  
BLACKS U.S.A., INC., WARNER MUSIC  
INTERNATIONAL SERVICES LIMITED,  
and WARNER RECORDS INC.,

Plaintiffs,

v.

SUNO, INC. and JOHN DOES 1-10,

Defendant.

Case No.:

**COMPLAINT**

**DEMAND FOR JURY TRIAL**

Plaintiffs UMG Recordings, Inc. (“UMG”) and Capitol Records, LLC (“Capitol,” and collectively with UMG, “Universal”); Sony Music Entertainment (“Sony”); Atlantic Recording Corporation (“Atlantic”), Atlantic Records Group LLC (“ARG”), Rhino Entertainment LLC (“Rhino”), The All Blacks U.S.A., Inc. (“The All Blacks”), Warner Music International Services Limited (“WMISL”), and Warner Records Inc. (collectively with Atlantic, ARG, Rhino, The All Blacks, and WMISL, “Warner,” and together with Universal and Sony, “Plaintiffs”), by and through their undersigned counsel, file this Complaint against Suno, Inc. (“Suno”) and allege as follows:

**NATURE OF THE ACTION**

1. From the invention of the phonograph record, through the eras of vinyl, cassette tapes, CDs, and now streaming and social media, the recorded music industry has been at the forefront of technological advancement. Artificial intelligence (“AI”) and machine learning are the next frontier of technological development, poised to push boundaries and expand commercial

opportunity. But with AI's enormous capabilities comes an equally enormous potential for abuse, making it critical that AI technology be implemented responsibly, ethically, and legally.

2. Most fundamentally, AI companies, like all other enterprises, must abide by the laws that protect human creativity and ingenuity. There is nothing that exempts AI technology from copyright law or that excuses AI companies from playing by the rules. This lawsuit seeks to enforce these basic principles.

3. Perhaps more so than with many other technologies, there is both promise and peril with AI. As more powerful and sophisticated AI tools emerge, the ability for AI to weave itself into the processes of music creation, production, and distribution grows. If developed with the permission and participation of copyright owners, generative AI tools will be able to assist humans in creating and producing new and innovative music. But if developed irresponsibly, without regard for fundamental copyright protections, those same tools threaten enduring and irreparable harm to recording artists, record labels, and the music industry, inevitably reducing the quality of new music available to consumers and diminishing our shared culture.

4. This case concerns a generative AI service, which allows users to generate digital music files that sound like genuine human sound recordings in response to basic inputs. The capacity for a generative AI service to produce convincing imitations of genuine sound recordings starts with copying a vast range of sound recordings. When those who develop such a service steal copyrighted sound recordings, the service's synthetic musical outputs could saturate the market with machine-generated content that will directly compete with, cheapen, and ultimately drown out the genuine sound recordings on which the service is built.

5. Foundational principles of copyright law dictate that copying protected sound recordings for the purpose of developing an AI product requires permission from rightsholders. Otherwise, such AI offerings will erode the value of the artistic works that comprise the essential raw materials that allow them to function in the first place. If left unmoored from existing and longstanding legal constraints, such products could supplant, rather than support, genuine human creativity.

6. Plaintiffs are record companies or recorded music businesses that, together, own or exclusively control copyrights in a great majority of the most commercially valuable sound recordings in the world. They have developed their enviable catalogs by discovering, developing, and promoting human recording artists, whose artistic contributions are the bedrock of the recorded music industry and the music we listen to today. These artists range from promising newcomers to the most famous musicians and performers in the world to myriad other artists who may not fill stadiums but who nevertheless shape culture. Plaintiffs have a track record of embracing innovation and have entered into voluntary free-market licensing deals that authorize the use of their protected sound recordings in emerging technologies. Such deals include full-catalog licenses with streaming music services and user-generated content platforms, and other licenses with innovative businesses associated with social media, fitness, gaming, the metaverse, and more.

7. Defendant Suno, Inc. is the company behind Suno AI, or simply Suno, a generative AI service that creates digital music files within seconds of receiving a user's prompts. Building and operating a service like Suno's requires at the outset copying and ingesting massive amounts of data to "train" a software "model" to generate outputs. For Suno specifically, this process involved copying decades worth of the world's most popular sound recordings and then ingesting those copies into Suno's AI model so it can generate outputs that imitate the qualities of genuine human sound recordings. Suno charges many of its users monthly fees to use its product and produce digital music files, which are designed to entertain, evoke emotion, and stoke passion just like the genuine sound recordings Suno copied.

8. Given that the foundation of its business has been to exploit copyrighted sound recordings without permission, Suno has been deliberately evasive about what exactly it has copied. This is unsurprising. After all, to answer that question honestly would be to admit willful copyright infringement on an almost unimaginable scale. Suno's executives instead speak publicly in exceedingly general terms. For example, one of Suno's co-founders posted online that Suno's

service trains on a “mix of proprietary and public data,”<sup>1</sup> while another co-founder stated that Suno’s training practices are “fairly in line with what other people are doing.”<sup>2</sup> Piercing the veil of secrecy, an early investor admitted that “if [Suno] had deals with labels when this company got started, I probably wouldn’t have invested in it. I think that they needed to make this product without the constraints.”<sup>3</sup>

9. Of course, it is obvious what Suno’s service is trained on. Suno copied Plaintiffs’ copyrighted sound recordings *en masse* and ingested them into its AI model. Suno’s product can only work the way it does by copying vast quantities of sound recordings from artists across every genre, style, and era. The copyrights in many of those sound recordings are owned or exclusively controlled by Plaintiffs. In other words, if Suno had taken efforts to avoid copying Plaintiffs’ sound recordings and ingesting them into its AI model, Suno’s service would not be able to reproduce the convincing imitations of such a vast range of human musical expression at the quality that Suno touts. Suno’s service trains on the expressive features of these copyrighted sound recordings for the ultimate purpose of poaching the listeners, fans, and potential licensees of the sound recordings it copied.

10. If there were any doubt regarding Suno’s unauthorized copying, Suno dispelled it by effectively conceding in pre-litigation correspondence that it copied Plaintiffs’ copyrighted sound recordings. When Plaintiffs directly accused Suno of copying Plaintiffs’ sound recordings to train its model, Suno did not deny or proffer any facts to undermine those allegations. It would have been simple for Suno to say that it used other, legally acquired recordings, if that were the case. Instead, Suno deflected and disingenuously asserted that its training data is “confidential business information.” Suno also claimed that its large-scale copying of sound recordings is “fair

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<sup>1</sup> @georg, Discord, Suno-General (Aug. 3, 2023).

<sup>2</sup> Rachel Metz, *The AI Music Era Is Here. Not Everyone Is a Fan*, Bloomberg (May 6, 2024), <https://www.bloomberg.com/news/articles/2024-05-06/suno-udio-and-more-the-ai-music-era-is-here-not-everyone-is-a-fan>.

<sup>3</sup> Brian Hiatt, *A ChatGPT for Music is Here. Inside Suno, the Startup Changing Everything*, Rolling Stone (Mar. 17, 2024), <https://www.rollingstone.com/music/music-features/suno-ai-chatgpt-for-music-1234982307/>.

use,” which was telling because fair use only arises as a defense to an otherwise unauthorized use of a copyrighted work. When Plaintiffs confronted Suno with these concessions, Suno did not respond.

11. Plaintiffs could have proceeded with this action based solely on eliciting that reasonable inference of copying. Nevertheless, Plaintiffs’ claims are based on much more. In particular, Plaintiffs tested Suno’s product and generated outputs using a series of prompts that pinpoint a particular sound recording by referencing specific subject matter, genre, artist, instruments, vocal style, and the like. Suno’s service repeatedly generated outputs that closely matched the targeted copyrighted sound recording, which means that Suno copied those copyrighted sound recordings to include in its training data. In addition, the public has observed (and Plaintiffs have confirmed) that even less targeted prompts can cause Suno’s product to generate outputs that resemble specific recording artists and specific copyrighted recordings. Such outputs are clear evidence that Suno trained its model on Plaintiffs’ copyrighted sound recordings.

12. Suno is not exempt from the copyright laws that protect human authorship. Like any other market participant, Suno cannot reproduce copyrighted works for a commercial purpose without permission. Heedless of this basic principle, Suno’s unauthorized copying erodes the value and integrity of Plaintiffs’ copyrighted sound recordings with rapid and devastating impact. Suno’s service generates music with such speed and scale that it risks overrunning the market with AI-generated music and generally devaluing and substituting for human-created work. Suno already has over 10,000,000 users generating music files using its product, with some outputs amassing upwards of 2,000,000 streams. These digital music files have been released to the public—some already finding their way onto the major streaming services—and compete with the copyrighted sound recordings that enabled their creation; yet Suno sought no permission from and gives no credit or compensation to the human artists or other rightsholders whose works fueled their creation.

13. Suno also profits substantially from its infringement of Plaintiffs’ copyrighted sound recordings. Suno’s latest funding round raised \$125 million, valuing the company at

approximately \$500 million. Suno further touts a roster of high-profile backers and has monetized its service, charging users up to \$24 per month for its highest subscription tier. None of that would be possible without the vast troves of copyrighted sound recordings that Suno copied to train its AI model.

14. Suno cannot avoid liability for its willful copyright infringement by claiming fair use. The doctrine of fair use promotes human expression by permitting the unlicensed use of copyrighted works in certain, limited circumstances, but Suno offers imitative machine-generated music—not human creativity or expression. Moreover, the Copyright Act enumerates four factors to assess whether an unauthorized use is fair, none of which favors Suno’s product. These factors are: (1) the purpose and character of the use; (2) the nature of the copyrighted work; (3) the amount and substantiality of the portion used in relation to the copyrighted work as a whole; and (4) the effect of the use upon the potential market for or value of the copyrighted work. In these circumstances, the purpose of Suno’s use of Plaintiffs’ copyrighted sound recordings is quintessentially commercial and creates directly competitive digital music files that serve the same purpose as the recorded music Plaintiffs create and substitute for genuine recordings by humans; Suno copies the key expressive features of Plaintiffs’ copyrighted sound recordings; those copyrighted sound recordings are at the core of copyright protection; and Suno’s infringement undermines both existing and potential commercial markets for selling, licensing, and distributing sound recordings. If left unchecked, Suno risks upending whole segments of the legitimate music industry.

15. At its core, this case is about ensuring that copyright continues to incentivize human invention and imagination, as it has for centuries. Achieving this end does not require stunting technological innovation, but it does require that Suno adhere to copyright law and respect the creators whose works allow it to function in the first place.

16. Plaintiffs bring this action seeking an injunction and damages commensurate with the scope of Suno’s massive and ongoing infringement.

**THE PARTIES**

17. Plaintiffs comprise the world's foremost record companies and recorded music businesses, engaged in the business of producing, manufacturing, distributing, selling, licensing, and otherwise commercializing sound recordings in the United States and the world through various media. Plaintiffs have made substantial investments in the development and promotion of some of the most prolific and well-known recording artists in the world. Plaintiffs' investments extend further to lesser-known artists as well, with an eye toward sustaining the music industry and discovering and supporting new generations of recording artists across all genres and styles. Pursuant to their relationships with artists, Plaintiffs own or exercise exclusive control over rights in millions of sound recordings of enormous cultural significance, artistic merit, and economic value.

18. Plaintiff UMG Recordings, Inc. is a Delaware corporation with its principal place of business at 2220 Colorado Avenue, Santa Monica, California 90404. UMG owns or exercises exclusive control over the copyrights for the sound recordings within its catalog.

19. Plaintiff Capitol Records, LLC is a Delaware limited liability company with its principal place of business at 2220 Colorado Avenue, Santa Monica, California 90404. Capitol owns or exercises exclusive control over the copyrights for the sound recordings within its catalog. A non-exhaustive list of specific sound recordings owned or exclusively controlled by Universal that Suno has infringed is attached as Exhibit A (the "Universal Works").

20. Plaintiff Sony Music Entertainment is a Delaware general partnership, the partners of which are citizens of New York and Delaware. Sony's headquarters and principal place of business are located at 25 Madison Avenue, New York, New York 10010. Sony owns or exercises exclusive control over the copyrights for the sound recordings within its catalog. A non-exhaustive list of specific sound recordings owned or exclusively controlled by Sony that Suno has infringed is attached as Exhibit A (the "Sony Works").

21. Plaintiff Atlantic Recording Corporation is a Delaware corporation with its principal place of business at 1633 Broadway, New York, New York 10019. Atlantic owns or

exercises exclusive control over the copyrights for the sound recordings within its catalog.

22. Plaintiff Atlantic Records Group LLC is a Delaware limited liability company with its principal place of business at 1633 Broadway, New York, New York 10019. ARG owns or exercises exclusive control over the copyrights for the sound recordings within its catalog.

23. Plaintiff Rhino Entertainment LLC is a Delaware limited liability company with its principal place of business at 777 S. Santa Fe Avenue, Los Angeles, California 90021. Rhino owns or exercises exclusive control over the copyrights for the sound recordings within its catalog.

24. Plaintiff The All Blacks U.S.A., Inc. is a Delaware corporation with its principal place of business at 1633 Broadway, New York, New York 10019. The All Blacks owns or exercises exclusive control over the copyrights for the sound recordings within its catalog.

25. Plaintiff Warner Music International Services Limited is a limited liability company organized and existing under the laws of England and Wales with its principal place of business at 27 Wrights Lane, London, England. WMISL owns or exercises exclusive control over the copyrights for the sound recordings within its catalog.

26. Plaintiff Warner Records Inc. is a Delaware corporation with its principal place of business at 777 S. Santa Fe Avenue, Los Angeles, California 90021. Warner Records Inc. owns or exercises exclusive control over the copyrights for the sound recordings within its catalog. A non-exhaustive list of specific sound recordings owned or exclusively controlled by Warner that Suno has infringed is attached as Exhibit A (the “Warner Works”).

27. A non-exhaustive, illustrative sampling of Plaintiffs’ federally copyrighted sound recordings that Suno has illegally reproduced is attached hereto as Exhibit A. Plaintiffs currently commercially exploit, and at all relevant times have commercially exploited, all the sound recordings listed in Exhibit A. Plaintiffs intend to amend the Complaint at an appropriate time to provide an expanded list of works that Suno has infringed.

28. Defendant Suno, Inc. is a Delaware corporation with its principal place of business at 17 Dunster Street, Cambridge, Massachusetts 02138.

29. Defendants John Does 1-10 are unknown parties who directly copied Plaintiffs’



federally copyrighted sound recordings, worked with Suno to copy Plaintiffs' federally copyrighted sound recordings, or have knowledge of Suno's direct infringement of the copyrighted sound recordings and intentionally induced and materially contributed to the infringement by assisting Suno's compiling, scraping, and/or copying of the copyrighted sound recordings for Suno's training data, intentionally promoted or encouraged Suno's infringing conduct by providing necessary tools and resources, and/or supervised and financially benefited from Suno's infringement.

### **JURISDICTION AND VENUE**

30. This is a civil action seeking damages and injunctive relief for infringement under the Copyright Act, 17 U.S.C. §§ 101, *et seq.*, and the Music Modernization Act, 17 U.S.C. § 1401. As such, this Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1338(a), based on federal question jurisdiction.

31. This Court has personal jurisdiction over Defendant Suno because its principal place of business, listed as 17 Dunster Street, Cambridge, Massachusetts 02138, is in this district.

32. Venue lies in this judicial district pursuant to 28 U.S.C. § 1391(b)(1) because Defendant Suno resides in this district.

### **FACTUAL BACKGROUND**

#### **Sound Recordings at Issue**

33. Plaintiffs own or exercise exclusive control over copyrights and/or exclusive rights under federal law in and to numerous valuable sound recordings. Exhibit A, attached hereto and incorporated herein by reference, contains a non-exhaustive, representative list of copyrighted sound recordings owned or exclusively controlled by Plaintiffs that Suno has directly infringed (the "Copyrighted Recordings"). Plaintiffs or their predecessors in interest have obtained Certificates of Copyright Registration for each of the post-1972 Copyrighted Recordings identified in Exhibit A.

34. Plaintiffs own or exercise exclusive control over copyrights and/or exclusive rights in and to numerous valuable sound recordings first "fixed" before February 15, 1972, which are

protected under the Music Modernization Act (“MMA”), 17 U.S.C. § 1401 *et seq.* In enacting the MMA, Congress directed the U.S. Copyright Office to create a process for rightsholders to submit schedules of pre-1972 sound recordings so that the Copyright Office can publicly index the recordings. 17 U.S.C. § 1401(f)(5)(A)(ii). Once the Copyright Office indexes a work, a rightsholder who sues for infringement of that work can recover statutory damages and attorneys’ fees just like any other copyright owner, pursuant to 17 U.S.C. §§ 504 and 505. For each of the pre-1972 Copyrighted Recordings listed in Exhibit A, Plaintiffs have filed with the Copyright Office schedules containing all information specified in 17 U.S.C. § 1401.

### **Suno Launches in 2023**

35. In July 2023, a group of individuals who collaborated at Kensho Technologies, an AI solutions business, launched a “beta” version of Suno’s AI music generation service. Suno’s stated vision is to “build[ ] a future where anyone can make great music. Whether you’re a shower singer or a charting artist, [Suno] break[s] barriers between you and the song you dream of making.”<sup>4</sup>

36. Suno initially engaged users to generate AI music files through its channel on the social media website Discord, and later rolled out a web interface to expand the reach of its music generation product. In December 2023, Suno announced a strategic partnership with Microsoft by which Suno’s service would be integrated into Microsoft’s AI chatbot Copilot.<sup>5</sup>

37. Whether using Suno’s website interface or Microsoft’s Copilot, Suno’s product allows users to enter text prompts to generate digital music files. Users can prompt Suno’s service with a description of the music they want to generate, which can include specifying the genre, lyrics, story direction, and themes to serve as inspiration. Within seconds, Suno’s service processes the user’s prompt and generates a digital music file (Suno’s website generates two files per prompt, whereas Copilot’s Suno plug-in generates one). Suno’s customization options then

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<sup>4</sup> Suno, About, <https://suno.com/about>.

<sup>5</sup> Microsoft, *Turn Your Ideas into Songs with Suno on Microsoft Copilot* (Dec. 19, 2023), <https://www.microsoft.com/en-us/microsoft-copilot/blog/2023/12/19/turn-your-ideas-into-songs-with-suno-on-microsoft-copilot/>.

allow users to adjust elements of the files, including tempo, mood, and genre.

38. Suno offers both free and paid versions of its product. Under the free plan, users are given 50 credits per day, equivalent to 10 music files. According to Suno's terms of service, free users cannot use the files they generate for commercial purposes.<sup>6</sup> Users can subscribe to the Pro and Premier plans for monthly fees of \$8 and \$24, respectively. The Pro plan gives users 2,500 credits per day, enough for 500 music files, while the Premier plan comes with 10,000 credits per day, enough for 2,000 music files. Under either paid subscription, Suno allows users to utilize their digital music files for commercial purposes, such as by uploading them to YouTube or music streaming services like Spotify or Apple Music. With this model, Suno earns revenue by encouraging users to generate digital music files and exploit them commercially. Put simply, the more digital music files Suno's service produces for its users, the more Suno charges.

39. On March 21, 2024, Suno launched a new version of its service, dubbed "v3," which it describes as its "first model capable of producing radio-quality music."<sup>7</sup> v3 enables all users, free or paid, to generate digital music files up to two minutes in length virtually instantaneously.

40. On May 30, 2024, Suno launched yet another version of its service, named "v3.5," which it describes as an updated version of v3.<sup>8</sup> v3.5 enables all users, free or paid, to generate digital music files up to four minutes in length virtually instantaneously. Suno has announced that its next version, "v4," is already in development and promises to continue "improving along the axes of quality, control, and speed."<sup>9</sup>

### **Suno Trains its AI Using Copyrighted Recordings**

41. AI models are developed to flexibly perform tasks that are typically expected to require human intelligence to achieve. "Generative AI" is a kind of AI aimed at producing content

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<sup>6</sup> Suno Blog, *Terms of Service* (Jan. 27, 2024), <https://suno.com/terms>.

<sup>7</sup> Suno Blog, *Introducing v3* (Mar. 21, 2024), <https://suno.com/blog/v3>.

<sup>8</sup> @suno\_ai\_, X (May 24, 2024), [https://x.com/suno\\_ai\\_/status/1794145852723777559](https://x.com/suno_ai_/status/1794145852723777559).

<sup>9</sup> @suno\_ai\_, X (Mar. 21, 2024), [https://x.com/suno\\_ai\\_/status/1770857568274911449](https://x.com/suno_ai_/status/1770857568274911449).

such as text, images, or (in Suno’s case) audio. The generative AI models rapidly advancing today, including Suno’s, are based on machine learning models. These models do not employ preset rules for generating outputs, but rather deduce patterns from a large corpus of training content. They store these patterns as billions of numerical parameters. In aggregate, these parameters constitute the model. The training process adjusts the parameters so that the model produces content that is based on the content on which the model is trained.

42. Upon information and belief, and consistent with the basic facts of how generative AI works, the content Suno used to “train” its AI model includes reams of Copyrighted Recordings that Suno reproduced without permission from Plaintiffs. Suno could not have built a model capable of producing audio so similar to the Copyrighted Recordings without the initial act of copying those recordings. This explains why one of Suno’s investors has publicly recognized that Suno’s service is likely to spawn litigation and that defending lawsuits from music labels is “the risk we had to underwrite when we invested in the company.”<sup>10</sup>

43. On information and belief, similar to other generative AI audio models, Suno trains its AI model to produce audio output by generally taking the following steps:

- a. Suno first copies massive numbers of sound recordings, including by “scraping” (*i.e.*, copying or downloading) them from digital sources. This vast collection of information forms the input, or “corpus,” upon which the Suno AI model is trained.
- b. Suno then “cleans” the copied recordings to remove any material, whether technical or substantive, that it does not wish to include in its AI model (for instance, duplicate or low-quality data). This step may also involve copying the recordings to convert them into a common digital audio format.
- c. Suno then processes this corpus of previously copied recordings to establish the values of the parameters that form its AI model. This step includes additional

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<sup>10</sup> Hiatt, *supra* n.3.

copying of the recordings, including into computer memory, as they are further converted and divided into units, and as those units are processed.

d. Suno next processes the data further to “finetune” its AI model, which may require additional copying of the collected sound recordings.

44. After undergoing this training process, Suno’s service gains the capacity to generate audio output based on Suno’s model, which, as just described, is a product of the corpus of sound recordings on which it is trained. When a user prompts Suno’s service with a text input (*e.g.*, make a jazz song about New York), the service generates an audio output by making generalizations about what the audio output should sound like based on the prompt and the corpus of sound recordings on which it was trained. Certain features of the outputs from Suno’s model betray that it was trained on particular data—in this case, the Copyrighted Recordings. In particular, Suno’s product frequently generates outputs with strong resemblance to the Copyrighted Recordings, a telltale sign that such recordings were included in its training data.

45. In technical terms, by generating outputs that mimic sound recordings in its training corpus, Suno’s model reflects the machine-learning phenomenon known as “overfitting.” An AI model is “overfitted” when it is too closely adapted to the data on which it was trained, making it difficult for the model to generalize to new data sets. One symptom of overfitting is a model that replicates portions of its training data. To take a simplified example, if a user inputs the prompt “a jazz song about New York” into an overfitted AI model, the model may output a file that closely resembles one of the jazz tracks on which it trained. As the myriad examples discussed below reflect, Suno’s model obviously was trained on the Copyrighted Recordings. This infringement cannot be cured by simply loosening the model’s fit or by implementing technical guardrails that make it less likely that outputs will match excerpts of the Copyrighted Recordings. In other words, modifying Suno’s offering in a way that better conceals its training data would not alter the fact that Suno infringed the Copyrighted Recordings the moment it copied them to create its model.

46. The basic point is that Suno’s model requires a vast corpus of sound recordings in order to output synthetic music files that are convincing imitations of human music. Suno’s corpus

includes the body of recorded music that people listen to in their everyday lives. Because of their sheer popularity and exposure, the Copyrighted Recordings had to be included within Suno's training data for Suno's model to be successful at creating the desired human-sounding outputs.

47. One of Suno's earliest investors has all but admitted that Suno's service trains on Plaintiffs' sound recordings. Antonio Rodriguez, a partner at the venture capital firm Matrix Partners, explained that his firm invested in the company with full knowledge that Suno might get sued by copyright owners, which he understood as "the risk we had to underwrite when we invested in the company."<sup>11</sup> Rodriguez pulled the curtain back further when he added that "honestly, if we had deals with labels when this company got started, I probably wouldn't have invested in it. I think they needed to make this product without the constraints."<sup>12</sup> By "constraints," Rodriguez was, of course, referring to the need to adhere to ordinary copyright rules and seek permission from rightsholders to copy and use their works. Rodriguez's message was clear: he was willing to "underwrite" the costs of the lawsuits relating to Suno's large-scale intellectual property theft because he expected his investment in Suno to be accretive despite the damages owed to copyright owners.

48. Suno's unlawful copying of the Copyrighted Recordings into its training data has not been lost on even casual users of Suno's product. Indeed, many observers have drawn this obvious conclusion, expressing alarm over the scope of Suno's unauthorized copying. To provide just a sample:

- "Though neither company will directly confirm or deny it, there is substantial reason to believe that . . . Suno . . . w[as] trained on copyrighted music, without permission[.]" Brian Hiatt, *AI-Music Arms Race: Meet Udio, the Other ChatGPT for Music*, Rolling Stone (Apr. 10, 2024).
- "While details about the data that trained these AI tools are sparse, there is plenty

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<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

of reason to believe that they are trained on copyrighted music.” Sharon Goldman, *AI Music May be Having a Moment, But Human Songwriters Would Like a Word*, Fortune (May 17, 2024).

- “Although Suno hasn’t revealed what music has been used to train its music-generation models, it seems almost certain that the startup has used materials without the explicit consent of their creators. For one thing, many of its musical outputs are somewhat similar to popular songs.” Mike Wheatley, *Generative AI Music Maker Startup Suno Raises \$125M in Funding*, SiliconAngle (May 21, 2024).
- “To create music as convincing as some of the examples generated by Suno and other platforms using AI algorithms means training those algorithms on existing music, and lots of it. And that’s where copyright comes into play, because it’s become plainly obvious that many AI models have been built by ingesting enormous quantities of copyrighted material.” Daniel Tencer, *Suno Could Get Sued By The Record Business. Who’s Backing it With \$125M?*, Music Business Worldwide (May 28, 2024).

49. When directly accused of using Plaintiffs’ sound recordings, Suno dodged and did not even try to dispute Plaintiffs’ allegations. Beyond this effective concession, Suno obfuscated and claimed that its training data is “confidential business information.”

#### **Suno’s Outputs Confirm Copying and Ingestion of Plaintiffs’ Copyrighted Recordings**

50. The fact that Suno’s product generates digital music files that mimic readily identifiable features of the Copyrighted Recordings supports the conclusion that Suno is using the Copyrighted Recordings in training its AI model. To be clear, Plaintiffs are not presently alleging that these outputs themselves infringe the Copyrighted Recordings unless discovery reveals that they directly or indirectly recapture portions of the Copyrighted Recordings. These outputs

confirm as an evidentiary matter that Suno has copied specific Copyrighted Recordings into its training data to build its service.

51. Plaintiffs designed a test that sometimes reveals the Copyrighted Recordings that Suno copied into its training data. Plaintiffs found that certain patterns of prompts can cause Suno's product to generate digital music files that contain melodic and stylistic similarities to well-known copyrighted sound recordings. As further explained below, those similarities betray that the model was trained on the Copyrighted Recordings.

52. Specifically, Plaintiffs discovered that using targeted prompts that include the characteristics of popular sound recordings—such as the decade the sound recording was released, as well as the topic, genre, and descriptions of the artist—can cause Suno's product to generate music files that strongly resemble the Copyrighted Recordings related to the descriptions in the prompt. In performing this test, Plaintiffs specified the lyrics for the output, so as to more easily surface the underlying melodic or rhythmic similarities with specific Copyrighted Recordings. This approach was designed to identify specific, copyrighted sound recordings that are likely in Suno's training data, since Suno has attempted to conceal the recordings on which it has trained. The results confirm that Suno has copied for training purposes the Copyrighted Recordings, because this degree of similarity in output would be impossible if Suno were not training on the Copyrighted Recordings.

53. As described below, the outputs from Suno's product share indisputable similarities with the Copyrighted Recordings, which results from training on the Copyrighted Recordings. One need only listen to hear the resemblance.<sup>13</sup>

54. For instance, Suno's service has generated 29 different outputs that contain the style of Chuck Berry's "Johnny B. Goode" (the copyright in which is owned by UMG). Using the prompt, "1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist,

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<sup>13</sup> Accompanying this Complaint and designated as Exhibit C is a thumb drive that contains all the Suno outputs referenced herein and in Exhibit B. In the event Suno seeks to remove this evidence of its infringing conduct from public view, the examples cited herein are preserved on this medium.



singer guitarist” and the lyrics from the original, one output titled “[Deep down in Louisiana close to New Orle](#)” replicates the highly distinctive rhythm of the original’s chorus, and uses the same melodic shape on the phrases “go Johnny, go, go.” These similarities are further reflected in the side-by-side transcriptions of the musical scores for the Suno file and the original recording.<sup>14</sup> These similarities are only possible because Suno copied the Copyrighted Recordings that contain these musical elements.

**Score: Deep down in Louisiana close to New Orle (Suno)**

The image displays a musical score for the song "Deep down in Louisiana close to New Orle" generated by Suno. The score is presented in three staves, each with a treble clef and a key signature of three sharps (F#, C#, G#). The time signature is 4/4. The lyrics are: "Go, go, go, John-ny, go, go, go, John-ny, go, go, go, John-ny, go, go, John-ny B. Goode..". The notes are color-coded: orange for notes that match the original in both pitch and rhythm, and red for notes that match in pitch but not rhythm. The score includes measure numbers 1, 5, and 8. The first staff covers measures 1-4, the second staff covers measures 5-8, and the third staff covers measures 9-12.

<sup>14</sup> Plaintiffs include the transcriptions of select Suno outputs and the Copyrighted Recordings they resemble to illustrate the technical, musical similarities between the two. To facilitate comparison of Suno’s output and the original Copyrighted Recording, each copyrighted song transcription has been transposed into the key and/or vocal register of the relevant Suno output. Red markings in the transcriptions indicate notes that are the same as the original in both pitch and rhythm, where orange markings indicate notes that use either the pitch or the rhythm of the original, but not both. Notes in Suno’s output that use the same scale degree as the corresponding note in the original copyrighted song but where the modality is changed from major to minor or vice versa (*e.g.*, a major third becoming a minor third) are represented as the same pitch in the transcriptions.

**Score: Johnny B. Goode (Chuck Berry)**

55. Another output also titled “[Deep down in Louisiana close to New Orle](#)” uses a melody on the first two lines that is virtually identical to the original, the only differences being a change in modality and two slight rhythmic changes. The 27 other outputs (included in Exhibit B) also include melodies in the verse and/or chorus that exhibit similarities with the original.

**Score: Deep down in Louisiana close to New Orle (Suno)**

**Score: Johnny B. Goode (Chuck Berry)**

56. Similarly, Suno’s service has generated 10 different outputs that resemble Bill Haley & His Comets’ “Rock Around the Clock” (the copyright in which is owned by UMG). To illustrate, one of these recordings, titled “[One, Two, Three O’Clock, Four O’Clock, r](#),” was generated using Suno’s service with the prompt “1954 rock and roll bill haley comets” and lyrics from the original. As the audio and transcriptions reflect, the output contains four lines at the beginning that are very similar to the original, with identical pitches and rhythm in many places. It also uses a melody later in the output on the phrase “we’re gonna rock around the clock tonight,” which is virtually identical to the melody of the original.

**Score: One, Two, Three O’Clock, Four O’Clock, r (Suno)**

One, two, three o' clock, four o' clock, rock, five, six, se-ven o' clock, eight

o' clock rock, nine, ten, e - le-ven o' clock, twelve o' clock rock, we're gon-na

rock a - round the clock to - night, put your glad rags on and

we're gon - na rock a - round the clock to - night, put your



**Score: Rock Around the Clock (Bill Haley & His Comets)**

One, two, three o' clock, four o' clock, rock, five, six, se-ven o' clock,  
 eight o' clock rock, nine, ten, e - le ven o' clock, twelve o' clock rock, we're gon-na  
 rock a - round the clock to - night, put your glad rags on  
 we're gon - na rock a - round the clock to - night, put your

57. The nine other outputs (included in Exhibit B) also include clear stylistic and melodic elements of the original sound recording.

58. As another example, Suno’s product generated an output that replicates the style and melody of James Brown’s “I Got You (I Feel Good)” (the copyright in which is owned by UMG). In the Suno output titled “[Wow! I feel good, I knew that I would no,](#)” the phrase “I knew that I would now” uses the same melody as the original.

**Score: Wow! I feel good, I knew that I would no (Suno)**

Swing  
 Wow! I feel good, I knew that I would now,  
 I feel good, I knew that I would now,

**Score: I Got You (I Feel Good) (James Brown)**

Wow! I feel good, I knew that I would now,  
I feel good, I knew that I would now,

59. Suno’s product has also generated 10 different outputs that contain a melody similar to one found in Jerry Lee Lewis’ “Great Balls of Fire” (the copyright in which is owned by UMG). One example, titled “[You shake my nerves and you rattle my br,](#)” was created with the original lyrics and the prompt “1950s rock and roll, jerry lee lewis, sun studio.” The output includes the well-known, characteristic large vocal leap up to the word “great” in the line “Goodness gracious, great balls of fire.” This line also replicates the rhythm of the original and follows a similar melodic shape. The nine other outputs contain a similar large vocal leap up to the word “great.”

**Score: You shake my nerves and you rattle my br (Suno)**

Good - ness gra - cious, great balls of fire,

**Score: Great Balls of Fire (Jerry Lee Lewis)**

Good - ness gra - cious, great balls of fire,

60. Suno’s service has also generated six different outputs that contain portions of B.B. King’s “The Thrill is Gone” (the copyright in which is owned by UMG). One example, also titled “[The Thrill is Gone,](#)” was generated with the prompt “slow minor blues, west coast blues, 12-bar

blues, king of the blues, electric guitar, gritty confident voice, 1969” and the original lyrics. The first phrase in the output, “the thrill is gone,” uses identical pitches to those used in the third occurrence of this phrase in the original sound recording. The second phrase, “the thrill has gone away,” is also very similar to the same phrase in the original.

**Score: The Thrill is Gone (Suno)**

The thrill is gone, \_ the thrill is gone a - way,

**Score: The Thrill is Gone (B.B. King)**

The thrill is gone, \_ the thrill is \_\_\_ gone a - way,

4  
the thrill is \_\_\_ gone, \_\_\_ ba - by, \_\_\_

61. As yet another example, Suno’s product generated a digital music file with portions that have striking resemblance to Michael Bublé’s hit “Sway” (the copyright in which is owned by Warner Records Inc.). Using the prompt “canadian smooth male singer 2004 jazz pop bubble sway latin mambo minor key” as well as lyrics from the original, Suno’s service created “[When marimba rhythms start to play,](#)” a file that contains an identical version of the distinctive opening on the words “when marimba rhythms,” virtually identical rhythm throughout, and repeated instances of the original’s characteristic three-note descending figure. Suno’s service generated 11 additional files that resemble “Sway,” which are listed in Exhibit B.



**Score: When marimba rhythms start to play (Suno)**

When ma-rim-ba rhy-thms start to play, dance with me, make me sway,  
 5 like a la-zy o-cean hugs the shore, hold me close, sway me more,  
 9 like a flo-wer bend-ing in the breeze, bend with me, \_ sway with ease,  
 13 when we dance, you have a way with me, stay with me, sway with me.

**Score: Sway (Michael Bublé)**

When ma-rim-ba rhy-thms start to play, dance with me, \_ make me sway,  
 5 like a la-zy o-cean hugs the shore, hold me close, sway me more,  
 9 like a flo-wer bend-ing in the breeze, bend with me, \_ sway with ease,  
 13 when you dance, you have a way with me, \_ stay with me, \_ sway with me. \_

62. Suno’s service has also generated audio outputs that contain vocals that are instantly recognizable due to their resemblance to those of famous recording artists. For example, even the biggest ABBA fan would have trouble distinguishing between sound recordings created

by the real band and the vocals in the Suno outputs “[Prancing Queen](#)” and “[Dancing in the Moonlight](#).” Suno’s service generated the former using the prompt, “70s pop” and the latter via the prompt “disco abba pop.”

63. Further evidencing Suno’s unauthorized copying of specific Copyrighted Recordings, Suno’s product has generated outputs that include recognizable producer tags. A producer tag is a short, distinctive sound that certain artists or producers include in their sound recordings to identify their affiliation with a particular recording. Producer tags are designed to be unique and instantly recognizable by fans. That certain Suno outputs replicate recognizable producer tags strongly suggests that Suno’s service trained on the protected sound recordings of a given producer.

64. For instance, the Suno output “[Rains of Castamere](#)” begins with the “CashMoneyAP” producer tag, even though the prompt used to generate this digital music file in no way referenced this producer. This output indicates a high likelihood that Suno’s service trained on sound recordings affiliated with the music producer CashMoneyAP, whose producer tag can be heard in the Copyrighted Recordings by artists such as [Da Baby](#) and [Pop Smoke](#).

65. The artist [Jason Derulo](#) is known for singing his own name at the beginning of his sound recordings.<sup>15</sup> Suno has also replicated this tag. For example, Jason Derulo’s name is repeated at the beginning of the Suno-generated digital music file aptly titled “[Jason Derulo](#),” in a manner exceedingly similar to how Jason Derulo tags his recordings. Again, Suno’s reproduction of this tag strongly suggests that Suno included Copyrighted Recordings by Jason Derulo in its training data.

66. These similarities between outputs of Suno’s product and the Copyrighted Recordings are not a coincidence. In fact, Suno co-founder Mikey Shulman admitted that Suno already has the ability to produce outputs that replicate real artists’ vocals and genuine sound

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<sup>15</sup> G. Garner, *Jason Derulo Reveals Why He Started Singing His Name at the Beginning of His Songs Again: ‘I Had to Bring That Back’*, Daily Mail (Oct. 16, 2020), <https://www.dailymail.co.uk/tvshowbiz/article-8849659/Jason-Derulo-reveals-started-singing-songs-bring-back.html>.



recordings, but Suno is holding back from allowing users to generate such replicas until “the licensing . . . climate is a little less uncertain.”<sup>16</sup> Suno’s capacity to replicate the vocals of human recording artists and other aspects of genuine sound recordings is only possible if Suno copied and trained its model using these artists’ copyrighted sound recordings.<sup>17</sup>

67. Additional outputs of Suno’s product that resemble the Copyrighted Recordings and specific recording artists can be found in Exhibit B.

### **Suno Cannot Claim Fair Use**

68. When Plaintiffs raised these issues with Suno in written correspondence, Suno attempted to justify its pervasive illegal copying of Plaintiffs’ sound recordings by claiming fair use. This, itself, is a tacit admission of Suno’s illegal copying, as fair use only comes into play when an unauthorized use of a copyrighted work needs to be justified.

69. The fair use doctrine has been coined an “equitable rule of reason” that balances various contextual factors to determine whether an unauthorized use of a copyrighted work is “fair.” *Sony Corp. v. Universal City Studios, Inc.*, 464 U.S. 417, 448 (1984). But Suno cannot launder its conscious stealing of the Copyrighted Recordings for commercial gain with an appeal to equitable principles. Suno understands that what it is doing is wrong and inequitable, which explains why it refused to even acknowledge the extent of its unauthorized use of Plaintiffs’ sound recordings, and why it tries to cover its tracks when users publicize outputs that clearly reflect training on their recordings.

70. Suno’s conduct violates the very purposes of the copyright law and runs contrary to the purpose animating the fair use doctrine. The Copyright Act codifies the common-law

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<sup>16</sup> @mignano, X at 43:55-44:53 (Mar. 8, 2024), <https://x.com/mignano/status/1766151562299163030>.

<sup>17</sup> See Joe Coscarelli, *An A.I. Hit of Fake ‘Drake’ and ‘The Weeknd’ Rattles the Music World*, N.Y. Times (Apr. 19, 2023), <https://www.nytimes.com/2023/04/19/arts/music/ai-drake-the-weeknd-fake.html> (explaining that “A.I. imitations of brand-name artists” have been created “using tools that had ‘learned’ from existing music and produced a similar effect.”); Jem Aswad, *What Would It Take for an AI-Generated Song to Qualify for a Grammy?*, Variety (Oct. 17, 2023), <https://variety.com/2023/music/news/grammys-ai-drake-weeknd-awards-1235758275/> (“Ghostwriter used generative AI to create Drake and Weeknd lyrics and melodies with no conscious input from those artists. He was able to do this by loading multiple copyrighted songs by those artists into a computer — ingesting data for machine learning, in technical terms — which is where the legal issues come in.”).

doctrine of fair use in 17 U.S.C. § 107, which identifies examples of the types of uses that may qualify as fair, including “criticism, comment, news reporting, teaching . . . scholarship, or research.” These paradigmatic fair uses reflect the policy of ensuring public availability of “literature, music, and other arts” so that other humans can draw on those works to create new ones. Suno’s wholesale copying of countless recordings serves none of these purposes. Suno’s service does not offer “commentary” or “scholarship” or promote human authorship. Rather, Suno’s service copies and ingests copyrighted works to create computer-generated imitations of human expression that do not merit copyright protection. Suno’s motive is brazenly commercial and threatens to displace the genuine human artistry that is at the heart of copyright protection.

71. Moreover, applying the statutory fair use factors set forth in § 107 demonstrates that Suno’s conduct fails to qualify as fair use. These factors are: “(1) the purpose and character of the use, including whether such use is of a commercial nature or is for nonprofit educational purposes; (2) the nature of the copyrighted work; (3) the amount and substantiality of the portion used in relation to the copyrighted work as a whole; and (4) the effect of the use upon the potential market for or value of the copyrighted work.” 17 U.S.C. § 107.

72. The first fair use factor focuses on “the problem of substitution—copyright’s *bête noire*.” *Andy Warhol Found. for the Visual Arts, Inc. v. Goldsmith*, 598 U.S. 508, 528 (2023). “The use of an original work to achieve a purpose that is the same as, or highly similar to, that of the original work is more likely to substitute for . . . the work,” and thus is less likely to constitute fair use. *Id.*

73. Suno claims its product can produce “radio-quality music,”<sup>18</sup> and encourages paid users to post their outputs to “platforms expressly designed to commercialize music.”<sup>19</sup> In furtherance of this objective, Suno copies Plaintiffs’ catalogs of sound recordings and generates digital music files that are designed to entertain, evoke emotion, and stoke passion, just like the

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<sup>18</sup> Suno Blog, *Introducing v3* (Mar. 21, 2024), <https://suno.com/blog/v3>.

<sup>19</sup> @keenan, Discord (Oct. 1, 2023).

genuine sound recordings on which Suno was trained. Suno feeds the Copyrighted Recordings into its AI model not merely to deconstruct their expressive content, but with the explicit aim of imitating these expressive features in digital music files that could serve as substitutes for and compete with the original recordings.

74. The use here is far from transformative, as there is no functional purpose for Suno’s AI model to ingest the Copyrighted Recordings other than to spit out new, competing music files. That Suno is copying the Copyrighted Recordings for a commercial purpose, and is deriving revenue directly proportional to the number of music files it generates, further tilts the first fair use factor against it. *See id.* at 532–33 (“If an original work and a secondary use share the same or highly similar purposes, and the secondary use is of a commercial nature, the first factor is likely to weigh against fair use, absent some other justification for copying.”).

75. The second fair use factor also favors Plaintiffs. This factor recognizes that “certain ‘works are closer to the core of intended copyright protection than others, with the consequence that fair use is more difficult to establish when the former works are copied.’” *TCA TV Corp. v. McCollum*, 839 F.3d 168, 184 (2d Cir. 2016) (quoting *Campbell v. Acuff-Rose Music, Inc.*, 510 U.S. 569, 586 (1994)). There is no doubt that the Copyrighted Recordings are the type of “creative expression for public dissemination [that] falls within the core of the copyright’s protective purposes.” *Hachette Book Grp., Inc. v. Internet Archive*, 664 F. Supp. 3d 370, 387 (S.D.N.Y. 2023) (quoting *Campbell*, 510 U.S. at 586).

76. So too does the third fair use factor weigh against fair use. “A finding of fair use is more likely when small amounts . . . are copied than when the copying is extensive, or encompasses the most important parts of the original.” *Authors Guild v. Google, Inc.*, 804 F.3d 202, 221 (2d Cir. 2015). It is abundantly clear that Suno copies (at least) the most important parts of the protected sound recordings it sweeps into its training data, as demonstrated by its ability to recreate, for instance, some of the most recognizable musical phrases, hooks, and choruses in popular music history. Suno then uses these copies of key elements of protectable expression to generate audio outputs that resemble the Copyrighted Recordings it ingests.

77. Turning to the fourth factor, Suno’s use of Copyrighted Recordings poses a significant threat to the market for and value of the Copyrighted Recordings. Licensing is at the core of Plaintiffs’ businesses, and Plaintiffs license the Copyrighted Recordings for myriad purposes, including for use in emerging technologies such as streaming services, user-generated content platforms, and other innovative technologies. Suno’s unauthorized use of the Copyrighted Recordings threatens to eliminate the existing market for licensing sound recordings, as well as the future market for licensing sound recordings to generative AI companies. Rather than license copyrighted recordings, potential licensees interested in licensing copyrighted recordings for their own purposes could generate an AI-soundlike at virtually no cost. This is an especially aberrant result when the replacement audio file is generated using an AI music service, like Suno’s, that produced the soundlike by infringing the copyrighted recording that would otherwise have been licensed.

78. Moreover, Suno’s product has the potential to generate directly competing digital music files at such speed that it risks overrunning the market for human-made sound recordings, including the Copyrighted Recordings on which it was trained. This competition is ramping up at a breathtaking pace. Suno has claimed that over 10,000,000 people have already created digital music files using its service.<sup>20</sup> Suno’s Terms of Service authorize the use of outputs generated on the platform by users who have subscribed to the paid tier for commercial purposes.<sup>21</sup> Users have taken this cue by publishing Suno-generated outputs on music streaming services, where they will compete for plays against real, copyrighted sound recordings.

79. Enticed by the prospect of exponential growth, Suno continues to circumvent the ordinary rules and steal vast amounts of copyrighted recordings to train its AI model. Suno’s efforts are “directly aimed at replacing the work of human artists with massive quantities of AI-created ‘sounds’ . . . that substantially dilute the royalty pools that are paid out to artists.”<sup>22</sup>

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<sup>20</sup> Mikey Shulman, *Suno Has Raised \$125 Million to Build a Future Where Anyone Can Make Music*, Suno Blog (May 21, 2024), <https://suno.com/blog/fundraising-announcement-may-2024>.

<sup>21</sup> Suno, Terms of Service, <https://suno.com/terms>.

<sup>22</sup> Artist Rights Alliance, *200+ Artists Urge Tech Platforms: Stop Devaluing Music*, Medium (Apr. 1, 2024),

80. The harm Suno is causing goes far beyond these immediate economic consequences. Suno's wholesale theft of the Copyrighted Recordings threatens the entire music ecosystem and the numerous people it employs. It also degrades the rights of artists to control their works, determine whether future uses of their works align with their aesthetic and personal values, and decide the products or services with which they wish to be associated. And it propagates the destructive theory that copyrighted music is free for the taking whenever a new technology claims that seeking and obtaining permission is just too cumbersome. In other words, Suno's conduct is a frontal attack on the very purpose of copyright law to reward authors and promote their incentives to continue creating copyrighted works.

81. There is room for AI and human creators to forge a sustainable, complementary relationship that promotes human creativity and facilitates the human creations that shape culture, excite the public, and resonate with consumers. This can and should be achieved through the well-established mechanism of free-market licensing that ensures proper respect for copyright owners. Like the other AI technologies that have struck licensing deals with copyright owners, copyright law mandates that Suno do the same if it wishes to build a business using the Copyrighted Recordings.

82. Since the day it launched, Suno has flouted the rights of copyright owners in the music industry as part of a mad dash to become the dominant AI music generation service. Neither Suno, nor any other generative AI company, can be allowed to advance toward this goal by trampling the rights of copyright owners.

**CLAIMS FOR RELIEF**

**FIRST CAUSE OF ACTION**

**(Direct Copyright Infringement of Post-1972 Copyrighted Recordings)**

83. Plaintiffs repeat, reallege, and incorporate the allegations in paragraphs 1–82 as if fully set forth herein.

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<https://artistrightsnow.medium.com/200-artists-urge-tech-platforms-stop-devaluing-music-559fb109bbac>.

84. Plaintiffs UMG and Capitol own or exercise exclusive control over rights in the Universal Works, which are an illustrative and non-exhaustive list of some of Universal's works infringed by Defendant through its development of Suno's service. Universal has duly registered each of the Universal Works.

85. Plaintiff Sony owns or exercises exclusive control over rights in the Sony Works, which are an illustrative and non-exhaustive list of some of Sony's works infringed by Defendant through its development of Suno's service. Sony has duly registered each of the Sony Works.

86. Plaintiffs Atlantic, ARG, Rhino, The All Blacks, WMISL, and Warner Records Inc. own or exercise exclusive control over rights in the Warner Works, which are an illustrative and non-exhaustive list of some of Warner's works infringed by Defendant through its development of Suno's service. Warner has duly registered each of the Warner Works.

87. Suno has knowingly infringed Plaintiffs' exclusive rights in copyrighted sound recordings, including but not limited to the Universal Works, the Sony Works, and the Warner Works, by reproducing them in violation of 17 U.S.C. § 106(1).

88. Suno does not have authorization, permission, license, or consent to reproduce or otherwise use the Universal Works, the Sony Works, or the Warner Works.

89. Upon information and belief, Suno used the reproductions of the Universal Works, the Sony Works, and the Warner Works to train its generative AI model.

90. Each of Suno's acts of infringement of the Universal Works, the Sony Works, and the Warner Works is a willful violation of 17 U.S.C. § 106.

91. As a direct and proximate result of Suno's infringement of Plaintiffs' exclusive rights, Suno has caused and will continue to cause irreparable injury to Plaintiffs for which Plaintiffs have no adequate remedy at law. Plaintiffs are therefore entitled to injunctive relief and to either actual damages and Suno's profits or statutory damages pursuant to 17 U.S.C. § 504(c), together with Plaintiffs' costs and reasonable attorneys' fees pursuant to 17 U.S.C. § 505.

**SECOND CAUSE OF ACTION**

**(Direct Copyright Infringement of Pre-1972 Copyrighted Recordings)**

92. Plaintiffs repeat, reallege, and incorporate the allegations in paragraphs 1–82 as if fully set forth herein.

93. Plaintiffs UMG and Capitol own or exercise exclusive control over rights in the Universal Works, which are an illustrative and non-exhaustive list of some of Universal’s works infringed by Defendant through its development of Suno’s service. All of the pre-1972 Universal Works have been submitted to and publicly indexed by the U.S. Copyright Office pursuant to 17 U.S.C. § 1401.

94. Plaintiff Sony owns or exercises exclusive control over rights in the Sony Works, which are an illustrative and non-exhaustive list of some of Sony’s works infringed by Defendant through its development of Suno’s service. All of the pre-1972 Sony Works have been submitted to and publicly indexed by the U.S. Copyright Office pursuant to 17 U.S.C. § 1401.

95. Plaintiffs Atlantic, ARG, Rhino, The All Blacks, WMISL, and Warner Records Inc. own or exercise exclusive control over rights in the Warner Works, which are an illustrative and non-exhaustive list of some of Warner’s works infringed by Defendant through its development of Suno’s service. All of the pre-1972 Warner Works have been submitted to and publicly indexed by the U.S. Copyright Office pursuant to 17 U.S.C. § 1401.

96. Suno has knowingly infringed Plaintiffs’ exclusive rights in copyrighted sound recordings, including but not limited to the Universal Works, the Sony Works, and the Warner Works, by reproducing them in violation of 17 U.S.C. §§ 106(1) and 1401(a)(1).

97. Suno does not have authorization, permission, license, or consent to reproduce or otherwise use the Universal Works, the Sony Works, or the Warner Works.

98. Upon information and belief, Suno used the reproductions of the Universal Works, the Sony Works, and the Warner Works to train its generative AI model.

99. Each of Suno’s acts of infringement of the Universal Works, the Sony Works, and the Warner Works is a willful violation of 17 U.S.C. § 106.

100. As a direct and proximate result of Suno's infringement of Plaintiffs' exclusive rights, Suno has caused and will continue to cause irreparable injury to Plaintiffs for which Plaintiffs have no adequate remedy at law. Plaintiffs are therefore entitled to injunctive relief and to either actual damages and Suno's profits or statutory damages pursuant to 17 U.S.C. § 504(c), together with Plaintiffs' costs and reasonable attorneys' fees pursuant to 17 U.S.C. § 505.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs respectfully request a judgment in their favor and against Suno as follows:

- A. For a declaration that Suno has willfully infringed Plaintiffs' protected sound recordings, including the Universal Works, the Sony Works, and the Warner Works.
- B. For such equitable relief under Title 17, Title 28, and/or the Court's inherent authority as is necessary to prevent or restrain infringement of Plaintiffs' protected sound recordings, including a preliminary and permanent injunction requiring that Suno and its officers, agents, servants, employees, attorneys, directors, successors, assigns, licensees, and all others in active concert or participation with any of them, cease infringing, or causing, aiding, enabling, facilitating, encouraging, promoting, inducing, or materially contributing to or participating in the infringement of any of Plaintiffs' exclusive rights under federal law, including without limitation in the sound recordings in Exhibit A;
- C. For statutory damages pursuant to 17 U.S.C. § 504(c), in an amount up to the maximum provided by law, arising from Suno's willful violations of Plaintiffs' rights, including in an amount up to \$150,000 per work infringed; or, in the alternative, at Plaintiffs' election, Plaintiffs' actual damages and/or Suno's profits from infringement pursuant to 17 U.S.C. § 504(b), in an amount to be proven at



trial;

- D. For an award of Plaintiffs' costs and disbursements in this action, including reasonable attorneys' fees, pursuant to 17 U.S.C. § 505;
- E. For an award of pre-judgment and post-judgment interest, to the fullest extent available, on any monetary award made part of the judgment against Suno; and
- F. For such other and further relief as the Court may deem just and proper.

**JURY DEMAND**

Plaintiffs demand a trial by jury on all claims for which trial by jury is proper.

Dated: June 24, 2024

HUESTON HENNIGAN LLP

By: Moez M. Kaba (to be admitted *pro hac vice*)  
Mariah N. Rivera (to be admitted *pro hac vice*)  
Alexander R. Perry (to be admitted *pro hac vice*)  
HUESTON HENNIGAN LLP  
1 Little West 12th Street  
New York, New York 10014  
Telephone: (646) 930-4046  
Facsimile: (888) 775-0898  
mkaba@hueston.com  
mrivera@hueston.com  
aperry@hueston.com

Robert N. Klieger (to be admitted *pro hac vice*)  
HUESTON HENNIGAN LLP  
523 West 6th Street, Suite 400  
Los Angeles, California 90014  
Telephone: (213) 788-4340  
Facsimile: (888) 775-0898  
rklieger@hueston.com



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Daniel J. Cloherty (BBO #565772)  
CLOHERTY & STEINBERG LLP  
One Financial Center, Suite 1120  
Boston, Massachusetts 02110  
Telephone: (617) 481-0160  
Facsimile: (617) 848-0830  
dcloherty@clohertysteinberg.com

*Attorneys for Plaintiffs*  
*UMG Recordings, Inc., Capitol Records,*  
*LLC, Sony Music Entertainment, Atlantic*  
*Recording Corporation, Atlantic Records*  
*Group LLC, Rhino Entertainment LLC, The*  
*All Blacks U.S.A., Inc., Warner Music*  
*International Services Limited, and Warner*  
*Records Inc.*

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS
UMG Recordings, Inc., Capitol Recordings, LLC, Sony Music Entertainment, Atlantic Recording Corporation,
(b) County of Residence of First Listed Plaintiff Los Angeles County, C (EXCEPT IN U.S. PLAINTIFF CASES)
(c) Attorneys (Firm Name, Address, and Telephone Number)
Moez M. Kaba, Hueston Hennigan LLP, 1 Little West 12th St., 2nd Fl., New York, NY 10014, Tele: (646)

DEFENDANTS
Sunco, Inc.
County of Residence of First Listed Defendant Middlesex County, MA (IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.
Attorneys (If Known)
Andrew Gass, Latham & Watkins LLP, 505 Montgomery St., Suite 2000, San Francisco, CA 94111; Tele: (415)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)
1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)
PTF DEF
Citizen of This State 1 1 Incorporated or Principal Place of Business In This State 4 4
Citizen of Another State 2 2 Incorporated and Principal Place of Business In Another State 5 5
Citizen or Subject of a Foreign Country 3 3 Foreign Nation 6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only) Click here for: Nature of Suit Code Descriptions.

Table with columns: CONTRACT, REAL PROPERTY, CIVIL RIGHTS, TORTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes various legal categories like Personal Injury, Labor, and Property Rights.

V. ORIGIN (Place an "X" in One Box Only)
1 Original Proceeding
2 Removed from State Court
3 Remanded from Appellate Court
4 Reinstated or Reopened
5 Transferred from Another District (specify)
6 Multidistrict Litigation - Transfer
8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION
Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 17 U.S.C. 101, et. seq, 17 U.S.C. 1401
Brief description of cause: Infringement of protected sound recordings.

VII. REQUESTED IN COMPLAINT:
CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: [X] Yes [ ] No

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE DOCKET NUMBER

DATE June 24, 2024 SIGNATURE OF ATTORNEY OF RECORD /s/ Daniel J. Cloherty (BBO #565772)

FOR OFFICE USE ONLY
RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE

**EXHIBIT A****Sound Recordings at Issue**

<b>#</b>	<b>Artist</b>	<b>Title</b>	<b>Reg. No.</b>	<b>Rights Owner</b>
1.	Jason Derulo	Acapulco	SR0000909583	Atlantic Recording Corporation
2.	Otis Redding	(Sittin' On) the Dock of the Bay	Pre-1972 Sound Recording	Atlantic Recording Corporation
3.	Otis Redding	A Change Is Gonna Come	Pre-1972 Sound Recording	Atlantic Recording Corporation
4.	Otis Redding	Cigarettes and Coffee	Pre-1972 Sound Recording	Atlantic Recording Corporation
5.	Otis Redding	For Your Precious Love	Pre-1972 Sound Recording	Atlantic Recording Corporation
6.	Otis Redding	Hard to Handle	Pre-1972 Sound Recording	Atlantic Recording Corporation
7.	Otis Redding	I've Been Loving You Too Long	Pre-1972 Sound Recording	Atlantic Recording Corporation
8.	Otis Redding	I've Got Dreams to Remember	Pre-1972 Sound Recording	Atlantic Recording Corporation
9.	Otis Redding	Love Man	Pre-1972 Sound Recording	Atlantic Recording Corporation
10.	Otis Redding	Merry Christmas Baby	Pre-1972 Sound Recording	Atlantic Recording Corporation
11.	Otis Redding	My Girl	Pre-1972 Sound Recording	Atlantic Recording Corporation
12.	Otis Redding	Pain in My Heart	Pre-1972 Sound Recording	Atlantic Recording Corporation
13.	Otis Redding	Shake	Pre-1972 Sound Recording	Atlantic Recording Corporation
14.	Otis Redding	Stand by Me	Pre-1972 Sound Recording	Atlantic Recording Corporation
15.	Otis Redding	That's How Strong My Love Is	Pre-1972 Sound Recording	Atlantic Recording Corporation
16.	Otis Redding	These Arms of Mine	Pre-1972 Sound Recording	Atlantic Recording Corporation
17.	Otis Redding	Try a Little Tenderness	Pre-1972 Sound Recording	Atlantic Recording Corporation
18.	Otis Redding	White Christmas	Pre-1972 Sound Recording	Atlantic Recording Corporation
19.	Otis Redding	Wonderful World	Pre-1972 Sound Recording	Atlantic Recording Corporation
20.	Otis Redding	You Send Me	Pre-1972 Sound Recording	Atlantic Recording Corporation
21.	Otis Redding & Carla Thomas	Tramp	Pre-1972 Sound Recording	Atlantic Recording Corporation

22.	Ray Charles	A Fool for You	Pre-1972 Sound Recording	Atlantic Recording Corporation
23.	Ray Charles	Ain't That Love	Pre-1972 Sound Recording	Atlantic Recording Corporation
24.	Ray Charles	Come Back Baby	Pre-1972 Sound Recording	Atlantic Recording Corporation
25.	Ray Charles	Come Rain or Come Shine	Pre-1972 Sound Recording	Atlantic Recording Corporation
26.	Ray Charles	Don't You Know	Pre-1972 Sound Recording	Atlantic Recording Corporation
27.	Ray Charles	Drown in My Own Tears	Pre-1972 Sound Recording	Atlantic Recording Corporation
28.	Ray Charles	Hallelujah, I Love Her So	Pre-1972 Sound Recording	Atlantic Recording Corporation
29.	Ray Charles	Hard Times (No One Knows Better Than I)	Pre-1972 Sound Recording	Atlantic Recording Corporation
30.	Ray Charles	I Believe to My Soul	Pre-1972 Sound Recording	Atlantic Recording Corporation
31.	Ray Charles	It Had to Be You	Pre-1972 Sound Recording	Atlantic Recording Corporation
32.	Ray Charles	I've Got A Woman	Pre-1972 Sound Recording	Atlantic Recording Corporation
33.	Ray Charles	Leave My Woman Alone	Pre-1972 Sound Recording	Atlantic Recording Corporation
34.	Ray Charles	Let the Good Times Roll	Pre-1972 Sound Recording	Atlantic Recording Corporation
35.	Ray Charles	Lonely Avenue	Pre-1972 Sound Recording	Atlantic Recording Corporation
36.	Ray Charles	Mary Ann	Pre-1972 Sound Recording	Atlantic Recording Corporation
37.	Ray Charles	Mess Around	Pre-1972 Sound Recording	Atlantic Recording Corporation
38.	Ray Charles	Sinner's Prayer	Pre-1972 Sound Recording	Atlantic Recording Corporation
39.	Ray Charles	What Would I Do Without You	Pre-1972 Sound Recording	Atlantic Recording Corporation
40.	Ray Charles	What'd I Say, Pt. 1 & 2	Pre-1972 Sound Recording	Atlantic Recording Corporation
41.	Ray Charles	You Won't Let Me Go	Pre-1972 Sound Recording	Atlantic Recording Corporation
42.	Jason Derulo	Take You Dancing	SR0000886298	Atlantic Records Group LLC
43.	The Beach Boys	409	Capitol filed 2019-03-25 - USCA20001612	Capitol Records, LLC
44.	The Beach Boys	All I Wanna Do	Capitol filed 2019-03-25 - USGJP1300033	Capitol Records, LLC
45.	The Beach Boys	All Summer Long	Capitol filed 2019-03-25 - USCA20001636	Capitol Records, LLC
46.	The Beach Boys	Barbara Ann	Capitol filed 2019-03-25 - GBCBR0100608	Capitol Records, LLC

47.	The Beach Boys	Be True To Your School (Single Version)	Capitol filed 3.22.2019 - GBCBR0100593	Capitol Records, LLC
48.	The Beach Boys	California Dreamin'	SR0000902518	Capitol Records, LLC
49.	The Beach Boys	California Girls	Capitol filed CALIFORNIA GIRLS 3.22.2019	Capitol Records, LLC
50.	The Beach Boys	Caroline, No	Capitol filed 2019-03-25	Capitol Records, LLC
51.	The Beach Boys	Catch A Wave	Capitol filed 3.22.2019 Catch A Wave	Capitol Records, LLC
52.	The Beach Boys	Dance, Dance, Dance	Capitol filed 2019-03-25	Capitol Records, LLC
53.	The Beach Boys	Darlin'	Capitol filed 2019-03-25	Capitol Records, LLC
54.	The Beach Boys	Do It Again	Capitol filed 2019-03-25	Capitol Records, LLC
55.	The Beach Boys	Do You Wanna Dance?	Capitol filed 2019-03-25	Capitol Records, LLC
56.	The Beach Boys	Don't Back Down	Capitol filed 3.22.2019 Don't Back Down	Capitol Records, LLC
57.	The Beach Boys	Don't Go Near The Water	Capitol filed 2019-03-25	Capitol Records, LLC
58.	The Beach Boys	Don't Hurt My Little Sister	Capitol filed 2019-03-25	Capitol Records, LLC
59.	The Beach Boys	Don't Talk (Put Your Head On My Shoulder)	Capitol filed 2019-03-25	Capitol Records, LLC
60.	The Beach Boys	Don't Worry Baby	Capitol filed 3.22.2019 Don't Worry Baby	Capitol Records, LLC
61.	The Beach Boys	Drive-In	Capitol filed 2019-03-25	Capitol Records, LLC
62.	The Beach Boys	Fall Breaks And Back To Winter	Capitol filed 2019-03-25	Capitol Records, LLC
63.	The Beach Boys	Farmer's Daughter	Capitol filed 3.22.2019 Farmer's Daughter	Capitol Records, LLC
64.	The Beach Boys	Feel Flows	Capitol filed 2019-03-25	Capitol Records, LLC
65.	The Beach Boys	Finders Keepers	Capitol filed 2019-03-25	Capitol Records, LLC
66.	The Beach Boys	Forever	Capitol filed 2019-03-25	Capitol Records, LLC
67.	The Beach Boys	Friends	Capitol filed FRIENDS 3.22.2019	Capitol Records, LLC
68.	The Beach Boys	Frosty The Snowman	Capitol filed 2019-03-25	Capitol Records, LLC
69.	The Beach Boys	Fun, Fun, Fun	Capitol filed 3.22.2019 Fun, Fun, Fun	Capitol Records, LLC
70.	The Beach Boys	Getting Hungry	Capitol filed 2019-03-25	Capitol Records, LLC
71.	The Beach Boys	Girl Don't Tell Me	Capitol filed 2019-03-25	Capitol Records, LLC

72.	The Beach Boys	Girls On The Beach	Capitol filed 3.22.2019 Girls On The Beach	Capitol Records, LLC
73.	The Beach Boys	God Only Knows	Capitol filed GOD ONLY KNOWS 3.22.2019	Capitol Records, LLC
74.	The Beach Boys	Good To My Baby	Capitol filed 2019-03-25	Capitol Records, LLC
75.	The Beach Boys	Good Vibrations	Capitol filed 2019-03-25	Capitol Records, LLC
76.	The Beach Boys	Got To Know The Woman	Capitol filed 2019-03-25	Capitol Records, LLC
77.	The Beach Boys	Graduation Day	Capitol filed 2019-03-25	Capitol Records, LLC
78.	The Beach Boys	Hang On To Your Ego	Capitol filed 2019-03-25	Capitol Records, LLC
79.	The Beach Boys	Hawaii	Capitol filed 2019-03-25	Capitol Records, LLC
80.	The Beach Boys	Heads You Win, Tails I Lose	Capitol filed 3.22.2019 Heads You Win, Tails I Lose	Capitol Records, LLC
81.	The Beach Boys	Help Me, Rhonda	Capitol filed 3.22.2019 Help Me, Rhonda	Capitol Records, LLC
82.	The Beach Boys	Here Comes The Night	Capitol filed 2019-03-25	Capitol Records, LLC
83.	The Beach Boys	Here Today	Capitol filed 2019-03-25	Capitol Records, LLC
84.	The Beach Boys	Heroes And Villains	Capitol filed 2019-03-25	Capitol Records, LLC
85.	The Beach Boys	Honky Tonk	Capitol filed 2019-03-25	Capitol Records, LLC
86.	The Beach Boys	How She Boogalooed It	Capitol filed 2019-03-25	Capitol Records, LLC
87.	The Beach Boys	Hully Gully	Capitol filed 2019-03-25	Capitol Records, LLC
88.	The Beach Boys	Hushabye	Capitol filed 2019-03-25	Capitol Records, LLC
89.	The Beach Boys	I Can Hear Music	Capitol filed 2019-03-25	Capitol Records, LLC
90.	The Beach Boys	I Do	Capitol filed 2019-03-25	Capitol Records, LLC
91.	The Beach Boys	I Get Around	Capitol filed 3.22.2019 I Get Around	Capitol Records, LLC
92.	The Beach Boys	I Get Around/Little Deuce Coupe	Capitol filed 2019-03-25	Capitol Records, LLC
93.	The Beach Boys	I Just Wasn't Made For These Times	Capitol filed 2019-03-25	Capitol Records, LLC
94.	The Beach Boys	I Know There's An Answer	Capitol filed 2019-03-25	Capitol Records, LLC
95.	The Beach Boys	I Was Made To Love Her	Capitol filed 2019-03-25	Capitol Records, LLC
96.	The Beach Boys	I Went To Sleep	Capitol filed 2019-03-25	Capitol Records, LLC



97.	The Beach Boys	I'd Love Just Once To See You	Capitol filed 2019-03-25	Capitol Records, LLC
98.	The Beach Boys	I'll Be Home For Christmas	Capitol filed 2019-03-25	Capitol Records, LLC
99.	The Beach Boys	I'm Bugged At My Ol' Man	Capitol filed 2019-03-25	Capitol Records, LLC
100.	The Beach Boys	I'm So Young	Capitol filed 2019-03-25	Capitol Records, LLC
101.	The Beach Boys	I'm Waiting For The Day	Capitol filed 2019-03-25	Capitol Records, LLC
102.	The Beach Boys	In My Room	Capitol filed 2019-03-25	Capitol Records, LLC
103.	The Beach Boys	In The Back Of My Mind	Capitol filed 2019-03-25	Capitol Records, LLC
104.	The Beach Boys	In The Parkin' Lot	Capitol filed 3.22.2019 In The Parkin' Lot	Capitol Records, LLC
105.	The Beach Boys	It's About Time	Capitol filed 2019-03-25	Capitol Records, LLC
106.	The Beach Boys	Johnny B. Goode	Capitol filed 2019-03-25	Capitol Records, LLC
107.	The Beach Boys	Keep An Eye On Summer	Capitol filed 2019-03-25	Capitol Records, LLC
108.	The Beach Boys	Kiss Me, Baby	Capitol filed KISS ME, BABY 3.22.2019	Capitol Records, LLC
109.	The Beach Boys	Lana	Capitol filed 2019-03-25	Capitol Records, LLC
110.	The Beach Boys	Land Ahoy	Capitol filed 2019-03-25	Capitol Records, LLC
111.	The Beach Boys	Let Him Run Wild	Capitol filed LET HIM RUN WILD 3.22.2019	Capitol Records, LLC
112.	The Beach Boys	Let The Wind Blow	Capitol filed 2019-03-25	Capitol Records, LLC
113.	The Beach Boys	Let's Go Away For Awhile	Capitol filed 2019-03-25	Capitol Records, LLC
114.	The Beach Boys	Let's Go Trippin'	Capitol filed 2019-03-25	Capitol Records, LLC
115.	The Beach Boys	Little Bird	Capitol filed 2019-03-25	Capitol Records, LLC
116.	The Beach Boys	Little Deuce Coupe	Capitol filed 3.22.2019 - Little Deuce Coupe	Capitol Records, LLC
117.	The Beach Boys	Little Girl (You're My Miss America)	Capitol filed 3.22.2019 Little Girl (You're My Miss America)	Capitol Records, LLC
118.	The Beach Boys	Little Honda	Capitol filed 2019-03-25	Capitol Records, LLC
119.	The Beach Boys	Little Pad	Capitol filed 2019-03-25	Capitol Records, LLC
120.	The Beach Boys	Little Saint Nick	Capitol filed 2019-03-25	Capitol Records, LLC
121.	The Beach Boys	Lonely Sea	Capitol filed 2019-03-25	Capitol Records, LLC



122.	The Beach Boys	Long Promised Road	Capitol filed 2019-03-25	Capitol Records, LLC
123.	The Beach Boys	Long Tall Texan	Capitol filed 2019-03-25	Capitol Records, LLC
124.	The Beach Boys	Lookin' At Tomorrow (A Welfare Song)	Capitol filed 2019-03-25	Capitol Records, LLC
125.	The Beach Boys	Louie Louie	Capitol filed 2019-03-25	Capitol Records, LLC
126.	The Beach Boys	Mama Says	Capitol filed 2019-03-25	Capitol Records, LLC
127.	The Beach Boys	Meant For You	Capitol filed 2019-03-25	Capitol Records, LLC
128.	The Beach Boys	Merry Christmas, Baby	Capitol filed 2019-03-25	Capitol Records, LLC
129.	The Beach Boys	Misirlou	Capitol filed 2019-03-25	Capitol Records, LLC
130.	The Beach Boys	Monster Mash	Capitol filed 2019-03-25	Capitol Records, LLC
131.	The Beach Boys	Moon Dawg	Capitol filed 3.22.2019 Moon Dawg	Capitol Records, LLC
132.	The Beach Boys	Mountain Of Love	Capitol filed 2019-03-25	Capitol Records, LLC
133.	The Beach Boys	Never Learn Not To Love	Capitol filed 2019-03-25	Capitol Records, LLC
134.	The Beach Boys	Noble Surfer	Capitol filed 2019-03-25	Capitol Records, LLC
135.	The Beach Boys	No-Go Showboat	Capitol filed 3.22.2019 No-Go Showboat	Capitol Records, LLC
136.	The Beach Boys	Old Folks At Home / Ol' Man River	Capitol filed 2019-03-25	Capitol Records, LLC
137.	The Beach Boys	Our Car Club	Capitol filed 2019-03-25	Capitol Records, LLC
138.	The Beach Boys	Our Favorite Recording Sessions	Capitol filed 2019-03-25	Capitol Records, LLC
139.	The Beach Boys	Our Prayer	Capitol filed 2019-03-25	Capitol Records, LLC
140.	The Beach Boys	Our Sweet Love	Capitol filed 2019-03-25	Capitol Records, LLC
141.	The Beach Boys	Papa-Oom-Mow-Mow	Capitol filed 2019-03-25	Capitol Records, LLC
142.	The Beach Boys	Passing By	Capitol filed 2019-03-25	Capitol Records, LLC
143.	The Beach Boys	Pet Sounds	Capitol filed 2019-03-25	Capitol Records, LLC
144.	The Beach Boys	Please Let Me Wonder	Capitol filed 2019-03-25	Capitol Records, LLC
145.	The Beach Boys	Pom Pom Play Girl	Capitol filed 3.22.2019 Pom Pom Play Girl	Capitol Records, LLC
146.	The Beach Boys	Rocking Surfer	Capitol filed 3.22.2019 Rocking Surfer	Capitol Records, LLC

147.	The Beach Boys	Salt Lake City	Capitol filed SALT LAKE CITY 3.22.2019	Capitol Records, LLC
148.	The Beach Boys	Santa's Beard	Capitol filed 2019-03-25	Capitol Records, LLC
149.	The Beach Boys	She Knows Me Too Well	Capitol filed SHE KNOWS ME TOO WELL 3.22.2019	Capitol Records, LLC
150.	The Beach Boys	Shut Down	Capitol filed 2019-03-25	Capitol Records, LLC
151.	The Beach Boys	Shut Down, Part II	Capitol filed 2019-03-25	Capitol Records, LLC
152.	The Beach Boys	Sloop John B	Capitol filed SLOOP JOHN B 3.22.2019	Capitol Records, LLC
153.	The Beach Boys	South Bay Surfer	Capitol filed 3.22.2019 South Bay Surfer	Capitol Records, LLC
154.	The Beach Boys	Spirit Of America	Capitol filed 3.22.2019 Spirit Of America	Capitol Records, LLC
155.	The Beach Boys	Stoked	Capitol filed 2019-03-25	Capitol Records, LLC
156.	The Beach Boys	Student Demonstration Time	Capitol filed 2019-03-25	Capitol Records, LLC
157.	The Beach Boys	Summer Means New Love	Capitol filed 2019-03-25	Capitol Records, LLC
158.	The Beach Boys	Summertime Blues	Capitol filed 2019-03-25	Capitol Records, LLC
159.	The Beach Boys	Surf Jam	Capitol filed 3.22.2019 Surf Jam	Capitol Records, LLC
160.	The Beach Boys	Surfer Girl	Capitol filed 3.22.2019 Surfer Girl	Capitol Records, LLC
161.	The Beach Boys	Surfer's Rule	Capitol filed 3.22.2019 Surfer's Rule	Capitol Records, LLC
162.	The Beach Boys	Surfin'	Capitol filed 3.22.2019 Surfin'	Capitol Records, LLC
163.	The Beach Boys	Surfin' Safari	Capitol filed 3.22.2019 Surfin' Safari	Capitol Records, LLC
164.	The Beach Boys	Surfin U.S.A.	Capitol filed 3.22.2019	Capitol Records, LLC
165.	The Beach Boys	Take A Load Off Your Feet	Capitol filed 2019-03-25	Capitol Records, LLC
166.	The Beach Boys	Tears In The Morning	Capitol filed 2019-03-25	Capitol Records, LLC
167.	The Beach Boys	Ten Little Indians	Capitol filed 2019-03-25	Capitol Records, LLC
168.	The Beach Boys	That's Not Me	Capitol filed 2019-03-25	Capitol Records, LLC
169.	The Beach Boys	The Baker Man	Capitol filed 2019-03-25	Capitol Records, LLC
170.	The Beach Boys	The Girl From New York City	Capitol filed 2019-03-25	Capitol Records, LLC
171.	The Beach Boys	The Little Girl I Once Knew	Capitol filed 2019-03-25	Capitol Records, LLC

172.	The Beach Boys	The Little Old Lady From Pasadena	Capitol filed 2019-03-25	Capitol Records, LLC
173.	The Beach Boys	The Man With All The Toys	Capitol filed 2019-03-25	Capitol Records, LLC
174.	The Beach Boys	The Nearest Faraway Place	Capitol filed 2019-03-25	Capitol Records, LLC
175.	The Beach Boys	The Shift	Capitol filed 2019-03-25	Capitol Records, LLC
176.	The Beach Boys	The Surfer Moon	Capitol filed 2019-03-25	Capitol Records, LLC
177.	The Beach Boys	The Times They Are A-Changin'	Capitol filed 2019-03-25	Capitol Records, LLC
178.	The Beach Boys	The Wanderer	Capitol filed 2019-03-25	Capitol Records, LLC
179.	The Beach Boys	The Warmth Of The Sun	Capitol filed 2019-03-25	Capitol Records, LLC
180.	The Beach Boys	Their Hearts Were Full Of Spring	Capitol filed 2019-03-25	Capitol Records, LLC
181.	The Beach Boys	Then I Kissed Her	Capitol filed 2019-03-25	Capitol Records, LLC
182.	The Beach Boys	There's No Other (Like My Baby)	Capitol filed 2019-03-25	Capitol Records, LLC
183.	The Beach Boys	This Car Of Mine	Capitol filed 3.22.2019 This Car Of Mine	Capitol Records, LLC
184.	The Beach Boys	This Whole World	Capitol filed 2019-03-25	Capitol Records, LLC
185.	The Beach Boys	'Til I Die	Capitol filed 2019-03-25	Capitol Records, LLC
186.	The Beach Boys	Time To Get Alone	Capitol filed 2019-03-25	Capitol Records, LLC
187.	The Beach Boys	Transcendental Meditation	Capitol filed 2019-03-25	Capitol Records, LLC
188.	The Beach Boys	Trombone Dixie	Capitol filed 2019-03-25	Capitol Records, LLC
189.	The Beach Boys	Vegetables	Capitol filed 2019-03-25	Capitol Records, LLC
190.	The Beach Boys	Wake The World	Capitol filed 2019-03-25	Capitol Records, LLC
191.	The Beach Boys	Walk On By	Capitol filed 2019-03-25	Capitol Records, LLC
192.	The Beach Boys	We Three Kings Of Orient Are	Capitol filed 2019-03-25	Capitol Records, LLC
193.	The Beach Boys	We'll Run Away	Capitol filed 3.22.2019 We'll Run Away	Capitol Records, LLC
194.	The Beach Boys	Wendy	Capitol filed 3.22.2019 Wendy	Capitol Records, LLC
195.	The Beach Boys	We're Together Again	Capitol filed 2019-03-25	Capitol Records, LLC
196.	The Beach Boys	When A Man Needs A Woman	Capitol filed 2019-03-25	Capitol Records, LLC

197.	The Beach Boys	When I Grow Up (To Be A Man)	Capitol filed 3.22.2019 When I Grow Up (To Be A Man)	Capitol Records, LLC
198.	The Beach Boys	Whistle In	Capitol filed 2019-03-25	Capitol Records, LLC
199.	The Beach Boys	White Christmas	Capitol filed 2019-03-25	Capitol Records, LLC
200.	The Beach Boys	Why Do Fools Fall In Love	Capitol filed 3.22.2019 Why Do Fools Fall In Love	Capitol Records, LLC
201.	The Beach Boys	Wild Honey	Capitol filed 2019-03-25	Capitol Records, LLC
202.	The Beach Boys	Wind Chimes	Capitol filed 2019-03-25	Capitol Records, LLC
203.	The Beach Boys	With Me Tonight	Capitol filed 2019-03-25	Capitol Records, LLC
204.	The Beach Boys	Wonderful	Capitol filed 2019-03-25	Capitol Records, LLC
205.	The Beach Boys	Wouldn't It Be Nice	Capitol filed 3.22.2019 - 5	Capitol Records, LLC
206.	The Beach Boys	You Still Believe In Me	Capitol filed 2019-03-25	Capitol Records, LLC
207.	The Beach Boys	Your Summer Dream	Capitol filed 3.22.2019 Your Summer Dream	Capitol Records, LLC
208.	The Beach Boys	You're So Good to Me	Capitol filed YOU'RE SO GOOD TO ME 3.22.2019	Capitol Records, LLC
209.	The Beach Boys	You're So Good To Me (Instrumental)	Capitol filed 2019-03-25	Capitol Records, LLC
210.	The Beach Boys	You're Welcome	Capitol filed 2019-03-25	Capitol Records, LLC
211.	The Beatles	A Day In The Life	Capitol filed A DAY IN THE LIFE 3.13.2019	Capitol Records, LLC
212.	The Beatles	A Hard Day's Night	Capitol filed A HARD DAY'S NIGHT 3.13.2019	Capitol Records, LLC
213.	The Beatles	A Taste of Honey	Capitol filed A TASTE OF HONEY 3.13.2019	Capitol Records, LLC
214.	The Beatles	Across The Universe	Capitol filed ACROSS THE UNIVERSE 3.13.2019	Capitol Records, LLC
215.	The Beatles	Act Naturally	Capitol filed ACT NATURALLY 3.13.2019	Capitol Records, LLC
216.	The Beatles	All I've Got To Do	Capitol filed ALL I'VE GOT TO DO 3.13.2019	Capitol Records, LLC
217.	The Beatles	All My Loving	Capitol filed ALL MY LOVING 3.13.2019	Capitol Records, LLC
218.	The Beatles	All Together Now	Capitol filed ALL TOGETHER NOW 3.13.2019	Capitol Records, LLC
219.	The Beatles	All You Need Is Love	Capitol filed ALL YOU NEED IS LOVE 3.13.2019	Capitol Records, LLC
220.	The Beatles	And I Love Her	Capitol filed AND I LOVE HER 3.13.2019	Capitol Records, LLC
221.	The Beatles	And Your Bird Can Sing	Capitol filed AND YOUR BIRD CAN SING 3.13.2019	Capitol Records, LLC

222.	The Beatles	Anna (Go To Him)	Capitol filed ANNA (GO TO HIM) 3.13.2019	Capitol Records, LLC
223.	The Beatles	Another Girl	Capitol filed ANOTHER GIRL 3.13.2019	Capitol Records, LLC
224.	The Beatles	Any Time At All	Capitol filed ANY TIME AT ALL 3.13.2019	Capitol Records, LLC
225.	The Beatles	Ask Me Why	Capitol filed ASK ME WHY 3.13.2019	Capitol Records, LLC
226.	The Beatles	Baby It's You	Capitol filed BABY IT'S YOU 3.13.2019	Capitol Records, LLC
227.	The Beatles	Baby You're A Rich Man	Capitol filed BABY YOU'RE A RICH MAN 3.13.2019	Capitol Records, LLC
228.	The Beatles	Baby's In Black	Capitol filed BABY'S IN BLACK 3.13.2019	Capitol Records, LLC
229.	The Beatles	Back In The U.S.S.R.	Capitol filed BACK IN THE U.S.S.R 3.13.2019	Capitol Records, LLC
230.	The Beatles	Bad Boy	Capitol filed BAD BOY 3.13.2019	Capitol Records, LLC
231.	The Beatles	Because of You	Capitol filed BECAUSE 3.13.2019	Capitol Records, LLC
232.	The Beatles	Being For The Benefit of Mr Kite!	Capitol filed BEING FOR THE BENEFIT OF MR KITE! 3.13.2019	Capitol Records, LLC
233.	The Beatles	Birthday	Capitol filed 3.13.2019	Capitol Records, LLC
234.	The Beatles	Birthday 2009 Remaster	Capitol filed Birthday 3.13.2019	Capitol Records, LLC
235.	The Beatles	Blackbird	Capitol filed BLACKBIRD 3.13.2019	Capitol Records, LLC
236.	The Beatles	Blue Jay Way	Capitol filed BLUE JAY WAY 3.13.2019	Capitol Records, LLC
237.	The Beatles	Boys	Capitol filed BOYS 3.13.2019	Capitol Records, LLC
238.	The Beatles	Can't Buy Me Love	Capitol filed CAN'T BUY ME LOVE 3.13.2019	Capitol Records, LLC
239.	The Beatles	Carry That Weight	Capitol filed CARRY THAT WEIGHT 3.13.2019	Capitol Records, LLC
240.	The Beatles	Chains	Capitol filed CHAINS 3.13.2019	Capitol Records, LLC
241.	The Beatles	Come Together	Capitol filed COME TOGETHER 3.13.2019	Capitol Records, LLC
242.	The Beatles	Cry Baby Cry	Capitol filed CRY BABY CRY 3.13.2019	Capitol Records, LLC
243.	The Beatles	Day Tripper	Capitol filed DAY TRIPPER 3.13.2019	Capitol Records, LLC
244.	The Beatles	Dear Prudence	Capitol filed DEAR PRUDENCE 3.13.2019	Capitol Records, LLC
245.	The Beatles	Devil In Her Heart	Capitol filed DEVIL IN HER HEART 3.13.2019	Capitol Records, LLC

246.	The Beatles	Dig It	Capitol filed 3.13.2019	Capitol Records, LLC
247.	The Beatles	Dizzy Miss Lizzy	Capitol filed DIZZY MISS LIZZY 3.13.2019	Capitol Records, LLC
248.	The Beatles	Do You Want To Know A Secret	Capitol filed DO YOU WANT TO KNOW A SECRET 3.13.2019	Capitol Records, LLC
249.	The Beatles	Don't Bother Me	Capitol filed DON'T BOTHER ME 3.13.2019	Capitol Records, LLC
250.	The Beatles	Don't Let Me Down	Capitol filed 3.13.2019	Capitol Records, LLC
251.	The Beatles	Don't Pass Me By	Capitol filed 3.13.2019	Capitol Records, LLC
252.	The Beatles	Drive My Car	Capitol filed DRIVE MY CAR 3.13.2019	Capitol Records, LLC
253.	The Beatles	Eight Days A Week	Capitol filed EIGHT DAYS A WEEK 3.13.2019	Capitol Records, LLC
254.	The Beatles	Eleanor Rigby	Capitol filed 3.13.2019 - Eleanor Rigby	Capitol Records, LLC
255.	The Beatles	Every Little Thing	Capitol filed 3.13.2019 - Every Little Thing	Capitol Records, LLC
256.	The Beatles	Everybody's Got Something To Hide Except Me And My Monkey	Capitol filed 3.13.2019	Capitol Records, LLC
257.	The Beatles	Everybody's Trying To Be My Baby	Capitol filed 3.13.2019	Capitol Records, LLC
258.	The Beatles	Fixing A Hole	Capitol filed 3.13.2019	Capitol Records, LLC
259.	The Beatles	Flying	Capitol filed 3.13.2019 - Flying	Capitol Records, LLC
260.	The Beatles	For No One	Capitol filed FOR NO ONE 3.13.2019	Capitol Records, LLC
261.	The Beatles	For You Blue	Capitol filed 3.13.2019	Capitol Records, LLC
262.	The Beatles	From Me To You	Capitol filed From Me To You 3.13.2019	Capitol Records, LLC
263.	The Beatles	Get Back	Capitol filed Get Back 3.13.2019	Capitol Records, LLC
264.	The Beatles	Getting Better	Capitol filed Getting Better 3.13.2019	Capitol Records, LLC
265.	The Beatles	Girl	Capitol filed 3.13.2019 - Girl	Capitol Records, LLC
266.	The Beatles	Glass Onion	Capitol filed GLASS ONION 3.13.2019	Capitol Records, LLC
267.	The Beatles	Golden Slumbers	Capitol filed Golden Slumbers 3.13.2019	Capitol Records, LLC
268.	The Beatles	Good Day Sunshine	Capitol filed GOOD DAY SUNSHINE 3.13.2019	Capitol Records, LLC



269.	The Beatles	Good Morning Good Morning	Capitol filed GOOD MORNING GOOD MORNING 3.13.2019	Capitol Records, LLC
270.	The Beatles	Good Night	Capitol filed GOOD NIGHT 3.13.2019	Capitol Records, LLC
271.	The Beatles	Got To Get You Into My Life	Capitol filed Got To Get You Into My Life 3.13.2019	Capitol Records, LLC
272.	The Beatles	Happiness Is A Warm Gun	Capitol filed HAPPINESS IS A WARM GUN 3.13.2019	Capitol Records, LLC
273.	The Beatles	Hello, Goodbye	Capitol filed HELLO, GOODBYE 3.13.2019	Capitol Records, LLC
274.	The Beatles	Help!	Capitol filed HELP! 3.13.2019	Capitol Records, LLC
275.	The Beatles	Helter Skelter	Capitol filed HELTER SKELTER 3.13.2019	Capitol Records, LLC
276.	The Beatles	Her Majesty	Capitol filed Her Majesty 3.13.2019	Capitol Records, LLC
277.	The Beatles	Here Comes The Sun	Capitol filed HERE COMES THE SUN 3.13.2019	Capitol Records, LLC
278.	The Beatles	Here, There And Everywhere	Capitol filed HERE, THERE AND EVERYWHERE 3.13.2019	Capitol Records, LLC
279.	The Beatles	Hey Bulldog	Capitol filed HEY BULLDOG 3.13.2019	Capitol Records, LLC
280.	The Beatles	Hey Jude	Capitol filed HEY JUDE 3.13.2019	Capitol Records, LLC
281.	The Beatles	Hold Me Tight	Capitol filed HOLD ME TIGHT 3.13.2019	Capitol Records, LLC
282.	The Beatles	Honey Don't	Capitol filed 3.13.2019	Capitol Records, LLC
283.	The Beatles	Honey Pie	Capitol filed Honey Pie 3.13.2019	Capitol Records, LLC
284.	The Beatles	I Am The Walrus	Capitol filed I Am The Walrus 3.13.2019	Capitol Records, LLC
285.	The Beatles	I Call Your Name	Capitol filed 3.13.2019	Capitol Records, LLC
286.	The Beatles	I Don't Want To Spoil The Party	Capitol filed 3.13.2019	Capitol Records, LLC
287.	The Beatles	I Feel Fine	Capitol filed I Feel Fine 3.13.2019	Capitol Records, LLC
288.	The Beatles	I Me Mine	Capitol filed I ME MINE 3.13.2019	Capitol Records, LLC
289.	The Beatles	I Need You	Capitol filed I Need You 3.13.2019	Capitol Records, LLC
290.	The Beatles	I Saw Her Standing There	Capitol filed I SAW HER STANDING THERE 3.13.2019	Capitol Records, LLC
291.	The Beatles	I Should Have Known Better	Capitol filed I Should Have Known Better 3.13.2019	Capitol Records, LLC
292.	The Beatles	I Wanna Be Your Man	Capitol filed I Wanna Be Your Man 3.13.2019	Capitol Records, LLC

293.	The Beatles	I Want To Hold Your Hand	Capitol filed I WANT TO HOLD YOUR HAND 3.13.2019	Capitol Records, LLC
294.	The Beatles	I Want To Tell You	Capitol filed I Want To Tell You 3.13.2019	Capitol Records, LLC
295.	The Beatles	I Want You (She's So Heavy)	Capitol filed I WANT YOU (SHE'S SO HEAVY) 3.13.2019	Capitol Records, LLC
296.	The Beatles	<b>I Will</b>	Capitol filed I WILL 3.13.2019	Capitol Records, LLC
297.	The Beatles	I'm Happy Just To Dance With You	Capitol filed I'M HAPPY JUST TO DANCE WITH YOU 3.13.2019	Capitol Records, LLC
298.	The Beatles	If I Fell	Capitol filed If I Fell 3.13.2019	Capitol Records, LLC
299.	The Beatles	If I Needed Someone	Capitol filed If I Needed Someone 3.13.2019	Capitol Records, LLC
300.	The Beatles	I'll Be Back	Capitol filed 3.13.2019	Capitol Records, LLC
301.	The Beatles	I'll Cry Instead	Capitol filed 3.13.2019	Capitol Records, LLC
302.	The Beatles	I'll Follow The Sun	Capitol filed I'll Follow The Sun 3.13.2019	Capitol Records, LLC
303.	The Beatles	I'll Get You	Capitol filed I'll Get You 3.13.2019	Capitol Records, LLC
304.	The Beatles	I'm A Loser	Capitol filed I'm A Loser 3.13.2019	Capitol Records, LLC
305.	The Beatles	I'm Down	Capitol filed I'm Down 3.13.2019	Capitol Records, LLC
306.	The Beatles	I'm Looking Through You	Capitol filed I'm Looking Through You 3.13.2019	Capitol Records, LLC
307.	The Beatles	I'm Only Sleeping	Capitol filed I'm Only Sleeping 3.13.2019	Capitol Records, LLC
308.	The Beatles	I'm So Tired	Capitol filed I'm So Tired 3.13.2019	Capitol Records, LLC
309.	The Beatles	In My Life	Capitol filed IN MY LIFE 3.13.2019	Capitol Records, LLC
310.	The Beatles	It Won't Be Long	Capitol filed It Won't Be Long 3.13.2019	Capitol Records, LLC
311.	The Beatles	It's All Too Much	Capitol filed It's All Too Much 3.13.2019	Capitol Records, LLC
312.	The Beatles	It's Only Love	Capitol filed It's Only Love 3.13.2019	Capitol Records, LLC
313.	The Beatles	I've Got A Feeling	Capitol filed I've Got A Feeling 3.13.2019	Capitol Records, LLC
314.	The Beatles	I've Just Seen A Face	Capitol filed I've Just Seen A Face 3.13.2019	Capitol Records, LLC
315.	The Beatles	Julia	Capitol filed JULIA 3.13.2019	Capitol Records, LLC
316.	The Beatles	Kansas City / Hey-Hey-Hey-Hey	Capitol filed Kansas City/Hey-Hey-Hey-Hey 3.13.2019	Capitol Records, LLC



317.	The Beatles	Komm Gib Mir Deine Hand	Capitol filed Komm, Gib Mir Deine Hand 3.13.2019	Capitol Records, LLC
318.	The Beatles	Lady Madonna	Capitol filed 3.13.2019	Capitol Records, LLC
319.	The Beatles	Let It Be	Capitol filed LET IT BE 3.13.2019	Capitol Records, LLC
320.	The Beatles	Little Child	Capitol filed 3.13.2019	Capitol Records, LLC
321.	The Beatles	Long Long Long	Capitol filed 3.13.2019	Capitol Records, LLC
322.	The Beatles	Long Tall Sally	Capitol filed 3.13.2019	Capitol Records, LLC
323.	The Beatles	Long, Long, Long	Capitol filed Long Long Long 3.13.2019	Capitol Records, LLC
324.	The Beatles	Love Me Do	Capitol filed LOVE ME DO 3.13.2019	Capitol Records, LLC
325.	The Beatles	Love You To	Capitol filed 3.13.2019	Capitol Records, LLC
326.	The Beatles	Lovely Rita	Capitol filed Lovely Rita 3.13.2019	Capitol Records, LLC
327.	The Beatles	Lucy In The Sky With Diamonds	Capitol filed Lucy In The Sky With Diamonds 3.13.2019	Capitol Records, LLC
328.	The Beatles	Maggie Mae	Capitol filed 3.13.2019	Capitol Records, LLC
329.	The Beatles	Magical Mystery Tour	Capitol filed Magical Mystery Tour 3.13.2019	Capitol Records, LLC
330.	The Beatles	March Of The Meanies	Capitol filed 3.13.2019	Capitol Records, LLC
331.	The Beatles	Martha My Dear	Capitol filed Martha My Dear 3.13.2019	Capitol Records, LLC
332.	The Beatles	Matchbox	Capitol filed Matchbox 3.13.2019	Capitol Records, LLC
333.	The Beatles	Maxwell's Silver Hammer	Capitol filed MAXWELL'S SILVER HAMMER 3.13.2019	Capitol Records, LLC
334.	The Beatles	Mean Mr Mustard	Capitol filed 3.13.2019	Capitol Records, LLC
335.	The Beatles	Michelle	Capitol filed Michelle 3.13.2019	Capitol Records, LLC
336.	The Beatles	Misery	Capitol filed Misery 3.13.2019	Capitol Records, LLC
337.	The Beatles	Money (That's What I Want)	Capitol filed 3.13.2019	Capitol Records, LLC
338.	The Beatles	Mother Nature's Son	Capitol filed MOTHER NATURE'S SON 3.13.2019	Capitol Records, LLC
339.	The Beatles	Mr Moonlight	Capitol filed MR MOONLIGHT 3.13.2019	Capitol Records, LLC
340.	The Beatles	No Reply	Capitol filed NO REPLY 3.13.2019	Capitol Records, LLC

341.	The Beatles	Norwegian Wood (This Bird Has Flown)	Capitol filed NORWEGIAN WOOD (THIS BIRD HAS FLOWN) 3.13.2019	Capitol Records, LLC
342.	The Beatles	Not A Second Time	Capitol filed 3.13.2019	Capitol Records, LLC
343.	The Beatles	Nowhere Man	Capitol filed NOWHERE MAN 3.13.2019	Capitol Records, LLC
344.	The Beatles	Ob-La-Di, Ob-La-Da	Capitol filed OB-LA-DI, OB-LA-DA 3.13.2019	Capitol Records, LLC
345.	The Beatles	Octopus's Garden	Capitol filed OCTOPUS'S GARDEN 3.13.2019	Capitol Records, LLC
346.	The Beatles	Oh! Darling	Capitol filed OH! DARLING 3.13.2019	Capitol Records, LLC
347.	The Beatles	Old Brown Shoe	Capitol filed Old Brown Shoe 3.13.2019	Capitol Records, LLC
348.	The Beatles	One After 909	Capitol filed 3.13.2019	Capitol Records, LLC
349.	The Beatles	Only A Northern Song	Capitol filed 3.13.2019	Capitol Records, LLC
350.	The Beatles	P.S. I Love You	Capitol filed P.S. I Love You 3.13.2019	Capitol Records, LLC
351.	The Beatles	Paperback Writer	Capitol filed PAPERBACK WRITER 3.13.2019	Capitol Records, LLC
352.	The Beatles	Penny Lane	Capitol filed PENNY LANE 3.13.2019	Capitol Records, LLC
353.	The Beatles	Pepperland	Capitol filed Pepperland 3.13.2019	Capitol Records, LLC
354.	The Beatles	Pepperland Laid Waste	Capitol filed 3.13.2019	Capitol Records, LLC
355.	The Beatles	Piggies	Capitol filed 3.13.2019	Capitol Records, LLC
356.	The Beatles	Please Mister Postman	Capitol filed PLEASE MISTER POSTMAN 3.13.2019	Capitol Records, LLC
357.	The Beatles	Please Please Me	Capitol filed PLEASE PLEASE ME 3.13.2019	Capitol Records, LLC
358.	The Beatles	Polythene Pam	Capitol filed POLYTHENE PAM 3.13.2019	Capitol Records, LLC
359.	The Beatles	Rain	Capitol filed RAIN 3.13.2019	Capitol Records, LLC
360.	The Beatles	Revolution	Capitol filed REVOLUTION 3.13.2019	Capitol Records, LLC
361.	The Beatles	Revolution 9	Capitol filed Revolution 9 3.13.2019	Capitol Records, LLC
362.	The Beatles	Rock And Roll Music	Capitol filed 3.13.2019	Capitol Records, LLC
363.	The Beatles	Rocky Raccoon	Capitol filed ROCKY RACCOON 3.13.2019	Capitol Records, LLC
364.	The Beatles	Roll Over Beethoven	Capitol filed ROLL OVER BEETHOVEN 3.13.2019	Capitol Records, LLC

365.	The Beatles	Run For Your Life	Capitol filed RUN FOR YOUR LIFE 3.13.2019	Capitol Records, LLC
366.	The Beatles	Savoy Truffle	Capitol filed 3.13.2019	Capitol Records, LLC
367.	The Beatles	Sea Of Holes	Capitol filed Sea Of Holes 3.13.2019	Capitol Records, LLC
368.	The Beatles	Sea Of Monsters	Capitol filed 3.13.2019	Capitol Records, LLC
369.	The Beatles	Sea Of Time	Capitol filed 3.13.2019	Capitol Records, LLC
370.	The Beatles	Sexy Sadie	Capitol filed SEXY SADIE 3.13.2019	Capitol Records, LLC
371.	The Beatles	Sgt Pepper'S Lonely Hearts Club Band	Capitol filed Sgt Pepper's Lonely Hearts Club Band 3.13.2019	Capitol Records, LLC
372.	The Beatles	Sgt Pepper's Lonely Hearts Club Band (Reprise)	Capitol filed 3.13.2019	Capitol Records, LLC
373.	The Beatles	She Came In Through The Bathroom Window	Capitol filed SHE CAME IN THROUGH THE BATHROOM WINDOW 3.13.2019	Capitol Records, LLC
374.	The Beatles	She Loves You	Capitol filed She Loves You 3.13.2019	Capitol Records, LLC
375.	The Beatles	She Said She Said	Capitol filed 3.13.2019	Capitol Records, LLC
376.	The Beatles	She's A Woman	Capitol filed 3.13.2019	Capitol Records, LLC
377.	The Beatles	She's Leaving Home	Capitol filed SHE'S LEAVING HOME 3.13.2019	Capitol Records, LLC
378.	The Beatles	Sie Liebt Dich	Capitol filed SIE LIEBT DICH 3.13.2019	Capitol Records, LLC
379.	The Beatles	Slow Down	Capitol filed SLOW DOWN 3.13.2019	Capitol Records, LLC
380.	The Beatles	Something	Capitol filed SOMETHING 3.13.2019	Capitol Records, LLC
381.	The Beatles	Strawberry Fields Forever	Capitol filed STRAWBERRY FIELDS FOREVER 3.13.2019	Capitol Records, LLC
382.	The Beatles	Sun King	Capitol filed SUN KING 3.13.2019	Capitol Records, LLC
383.	The Beatles	Taxman	Capitol filed TAXMAN 3.13.2019	Capitol Records, LLC
384.	The Beatles	Tell Me What You See	Capitol filed 3.13.2019	Capitol Records, LLC
385.	The Beatles	Tell Me Why	Capitol filed TELL ME WHY 3.13.2019	Capitol Records, LLC
386.	The Beatles	Thank You Girl	Capitol filed 3.13.2019	Capitol Records, LLC
387.	The Beatles	The Ballad Of John And Yoko	Capitol filed THE BALLAD OF JOHN AND YOKO 3.13.2019	Capitol Records, LLC
388.	The Beatles	The Continuing Story Of Bungalow Bill	Capitol filed 3.13.2019	Capitol Records, LLC

389.	The Beatles	The End	Capitol filed THE END 3.13.2019	Capitol Records, LLC
390.	The Beatles	The Fool On The Hill	Capitol filed THE FOOL ON THE HILL 3.13.2019	Capitol Records, LLC
391.	The Beatles	The Inner Light	Capitol filed 3.13.2019	Capitol Records, LLC
392.	The Beatles	The Long And Winding Road	Capitol filed 3.13.2019	Capitol Records, LLC
393.	The Beatles	The Night Before	Capitol filed THE NIGHT BEFORE 3.13.2019	Capitol Records, LLC
394.	The Beatles	The Word	Capitol filed THE WORD 3.13.2019	Capitol Records, LLC
395.	The Beatles	There's A Place	Capitol filed THERE'S A PLACE 3.13.2019	Capitol Records, LLC
396.	The Beatles	Things We Said Today	Capitol filed THINGS WE SAID TODAY 3.13.2019	Capitol Records, LLC
397.	The Beatles	Think For Yourself	Capitol filed 3.13.2019	Capitol Records, LLC
398.	The Beatles	This Boy	Capitol filed THIS BOY 3.13.2019	Capitol Records, LLC
399.	The Beatles	Ticket To Ride	Capitol filed TICKET TO RIDE 3.13.2019	Capitol Records, LLC
400.	The Beatles	Till There Was You	Capitol filed TILL THERE WAS YOU 3.13.2019	Capitol Records, LLC
401.	The Beatles	Tomorrow Never Knows	Capitol filed TOMORROW NEVER KNOWS 3.13.2019	Capitol Records, LLC
402.	The Beatles	Twist And Shout	Capitol filed TWIST AND SHOUT 3.13.2019	Capitol Records, LLC
403.	The Beatles	Two Of Us	Capitol filed Two Of Us 3.13.2019	Capitol Records, LLC
404.	The Beatles	Wait	Capitol filed WAIT 3.13.2019	Capitol Records, LLC
405.	The Beatles	We Can Work It Out	Capitol filed 3.13.2019	Capitol Records, LLC
406.	The Beatles	What Goes On	Capitol filed 3.13.2019	Capitol Records, LLC
407.	The Beatles	What You're Doing	Capitol filed 3.13.2019	Capitol Records, LLC
408.	The Beatles	When I Get Home	Capitol filed When I Get Home 3.13.2019	Capitol Records, LLC
409.	The Beatles	When I'm Sixty Four	Capitol filed 3.13.2019	Capitol Records, LLC
410.	The Beatles	While My Guitar Gently Weeps	Capitol filed WHILE MY GUITAR GENTLY WEEPS 3.13.2019	Capitol Records, LLC
411.	The Beatles	Why Don't We Do It In The Road	Capitol filed 3.13.2019	Capitol Records, LLC
412.	The Beatles	Wild Honey Pie	Capitol filed WILD HONEY PIE 3.13.2019	Capitol Records, LLC

413.	The Beatles	With A Little Help From My Friends	Capitol filed WITH A LITTLE HELP FROM MY FRIENDS 3.13.2019	Capitol Records, LLC
414.	The Beatles	Within You Without You	Capitol filed 3.13.2019	Capitol Records, LLC
415.	The Beatles	Words Of Love	Capitol filed 3.13.2019	Capitol Records, LLC
416.	The Beatles	Yellow Submarine	Capitol filed Yellow Submarine 3.13.2019	Capitol Records, LLC
417.	The Beatles	Yellow Submarine In Pepperland	Capitol filed 3.13.2019	Capitol Records, LLC
418.	The Beatles	Yer Blues	Capitol filed 3.13.2019	Capitol Records, LLC
419.	The Beatles	Yes It Is	Capitol filed YES IT IS 3.13.2019	Capitol Records, LLC
420.	The Beatles	Yesterday	Capitol filed YESTERDAY 3.13.2019	Capitol Records, LLC
421.	The Beatles	You Can't Do That	Capitol filed 3.13.2019	Capitol Records, LLC
422.	The Beatles	You Know My Name	Capitol filed 3.13.2019	Capitol Records, LLC
423.	The Beatles	You Like Me Too Much	Capitol filed YOU LIKE ME TOO MUCH 3.13.2019	Capitol Records, LLC
424.	The Beatles	You Never Give Me Your Money	Capitol filed 3.13.2019	Capitol Records, LLC
425.	The Beatles	You Really Got A Hold On Me	Capitol filed YOU REALLY GOT A HOLD ON ME 3.13.2019	Capitol Records, LLC
426.	The Beatles	You Won't See Me	Capitol filed 3.13.2019	Capitol Records, LLC
427.	The Beatles	Your Mother Should Know	Capitol filed YOUR MOTHER SHOULD KNOW 3.13.2019	Capitol Records, LLC
428.	The Beatles	You're Going To Lose That Girl	Capitol filed YOU'RE GOING TO LOSE THAT GIRL 3.13.2019	Capitol Records, LLC
429.	The Beatles	You've Got To Hide Your Love Away	Capitol filed YOU'VE GOT TO HIDE YOUR LOVE AWAY 3.13.2019	Capitol Records, LLC
430.	The Doors	Roadhouse Blues	Pre-1972 Sound Recording	Rhino Entertainment LLC
431.	Michael Jackson	Billie Jean	SR0000041965	Sony Music Entertainment
432.	Michael Jackson	Beat It	SR0000041965	Sony Music Entertainment
433.	Michael Jackson	Thriller	SR0000041965	Sony Music Entertainment
434.	Michael Jackson	Rock With You	SR0000011120	Sony Music Entertainment
435.	Michael Jackson	Smooth Criminal	SR0000084256	Sony Music Entertainment

436.	Michael Jackson	Don't Stop 'Til You Get Enough	SR0000011105	Sony Music Entertainment
437.	Michael Jackson	P.Y.T. (Pretty Young Thing)	SR0000041965	Sony Music Entertainment
438.	Michael Jackson	The Way You Make Me Feel	SR0000084256	Sony Music Entertainment
439.	Michael Jackson	Man in the Mirror	SR0000084256	Sony Music Entertainment
440.	Michael Jackson	Remember the Time	SR0000178165	Sony Music Entertainment
441.	Michael Jackson	Bad	SR0000084256	Sony Music Entertainment
442.	Michael Jackson	Wanna Be Startin' Somethin'	SR0000041965	Sony Music Entertainment
443.	Michael Jackson	You Rock My World	SR0000791010	Sony Music Entertainment
444.	Michael Jackson	Chicago	SR0000754292	Sony Music Entertainment
445.	Michael Jackson	Black or White	SR0000178165	Sony Music Entertainment
446.	Michael Jackson	Human Nature	SR0000041965	Sony Music Entertainment
447.	Michael Jackson	Dirty Diana	SR0000084256	Sony Music Entertainment
448.	Michael Jackson	You Are Not Alone	SR0000212660	Sony Music Entertainment
449.	Michael Jackson	Off The Wall	SR0000011120	Sony Music Entertainment
450.	Michael Jackson	Heaven Can Wait	SR0000304780	Sony Music Entertainment
451.	Michael Jackson	They Don't Care About Us	SR0000212660	Sony Music Entertainment
452.	Michael Jackson	The Lady In My Life	SR0000041965	Sony Music Entertainment
453.	Michael Jackson	The Girl Is Mine	SR0000041013/SR0000042782	Sony Music Entertainment
454.	Michael Jackson	Butterflies	SR0000304780	Sony Music Entertainment
455.	Michael Jackson	Baby Be Mine	SR0000041965	Sony Music Entertainment
456.	Michael Jackson	Heal the World	SR0000178165	Sony Music Entertainment
457.	Michael Jackson	Earth Song	SR0000212660	Sony Music Entertainment
458.	Michael Jackson	I Can't Help It	SR0000011120	Sony Music Entertainment
459.	Michael Jackson	I Just Can't Stop Loving You	SR0000822650	Sony Music Entertainment
460.	Michael Jackson	Workin' Day and Night	SR0000011120	Sony Music Entertainment



461.	Michael Jackson	Leave Me Alone	SR0000084255	Sony Music Entertainment
462.	Michael Jackson	Will You Be There	SR0000178165	Sony Music Entertainment
463.	Michael Jackson	Beat It (2008 with Fergie Remix)	SR0000613501	Sony Music Entertainment
464.	Michael Jackson	Dangerous	SR0000178165	Sony Music Entertainment
465.	Michael Jackson	Jam	SR0000178165	Sony Music Entertainment
466.	Michael Jackson	Liberian Girl	SR0000084256	Sony Music Entertainment
467.	Michael Jackson	She's Out Of My Life	SR0000011120	Sony Music Entertainment
468.	Michael Jackson	In the Closet	SR0000178165	Sony Music Entertainment
469.	Michael Jackson	Another Part Of Me	SR0000084256	Sony Music Entertainment
470.	Michael Jackson	Love Never Felt So Good	SR0000754292	Sony Music Entertainment
471.	Ray Charles	Two Old Cats Like Us	SR0000058443	Sony Music Entertainment
472.	Ray Charles	This Old Heart (Is Gonna Rise Again)	SR0000058443	Sony Music Entertainment
473.	Ray Charles	We Didn't See a Thing	SR0000058443	Sony Music Entertainment
474.	Ray Charles	Who Cares	SR0000058443	Sony Music Entertainment
475.	Ray Charles	Rock and Roll Shoes	SR0000057170	Sony Music Entertainment
476.	Ray Charles	Friendship	SR0000058443	Sony Music Entertainment
477.	Ray Charles	It Ain't Gonna Worry My Mind	SR0000058443	Sony Music Entertainment
478.	Ray Charles	Little Hotel Room	SR0000058443	Sony Music Entertainment
479.	Ray Charles	Crazy Old Soldier	SR0000058443	Sony Music Entertainment
480.	Ray Charles	Seven Spanish Angels	SR0000058443	Sony Music Entertainment
481.	Slipknot	(sic)	SR0000301094	The All Blacks U.S.A., Inc.
482.	Slipknot	Before I Forget	SR0000358238	The All Blacks U.S.A., Inc.
483.	Slipknot	Dead Memories	SR0000656810	The All Blacks U.S.A., Inc.
484.	Slipknot	Disasterpiece	SR0000330440	The All Blacks U.S.A., Inc.
485.	Slipknot	Duality	SR0000358238	The All Blacks U.S.A., Inc.

486.	Slipknot	Eyeless	SR0000301094	The All Blacks U.S.A., Inc.
487.	Slipknot	Killpop	SR0000768649	The All Blacks U.S.A., Inc.
488.	Slipknot	Left Behind	SR0000330440	The All Blacks U.S.A., Inc.
489.	Slipknot	My Plague	SR0000330440	The All Blacks U.S.A., Inc.
490.	Slipknot	People = Shit	SR0000330440	The All Blacks U.S.A., Inc.
491.	Slipknot	Psychosocial	SR0000656810	The All Blacks U.S.A., Inc.
492.	Slipknot	Snuff	SR0000656810	The All Blacks U.S.A., Inc.
493.	Slipknot	Spit It Out	SR0000301094	The All Blacks U.S.A., Inc.
494.	Slipknot	Sulfur	SR0000656810	The All Blacks U.S.A., Inc.
495.	Slipknot	Surfacing	SR0000301094	The All Blacks U.S.A., Inc.
496.	Slipknot	The Blister Exists	SR0000358238	The All Blacks U.S.A., Inc.
497.	Slipknot	The Heretic Anthem	SR0000330440	The All Blacks U.S.A., Inc.
498.	Slipknot	Vermilion	SR0000358238	The All Blacks U.S.A., Inc.
499.	Slipknot	Vermilion, Pt. 2	SR0000358238	The All Blacks U.S.A., Inc.
500.	Slipknot	Wait and Bleed	SR0000301094	The All Blacks U.S.A., Inc.
501.	ABBA	Andante, Andante	SR0000024153	UMG Recordings, Inc.
502.	ABBA	Angel Eyes	SR0000010318	UMG Recordings, Inc.
503.	ABBA	Chiquitita	SR0000010318	UMG Recordings, Inc.
504.	ABBA	Dame! Dame! Dame!	SR0000025354	UMG Recordings, Inc.
505.	ABBA	Dancing Queen	SR0000303039	UMG Recordings, Inc.
506.	ABBA	Does Your Mother Know	SR0000009415	UMG Recordings, Inc.
507.	ABBA	Eagle	SR0000000071	UMG Recordings, Inc.
508.	ABBA	Estoy Sonando	SR0000025354	UMG Recordings, Inc.
509.	ABBA	Fernando	SR0000025354	UMG Recordings, Inc.
510.	ABBA	Gimme! Gimme! Gimme! (A Man After Midnight)	SR0000015044	UMG Recordings, Inc.



511.	ABBA	Happy New Year	SR0000024153	UMG Recordings, Inc.
512.	ABBA	Head Over Heels	SR0000031826	UMG Recordings, Inc.
513.	ABBA	Honey, Honey	N00000016810 / RE0000867304	UMG Recordings, Inc.
514.	ABBA	I Do, I Do, I Do, I Do, I Do	SR0000040286	UMG Recordings, Inc.
515.	ABBA	I Have A Dream	SR0000010318	UMG Recordings, Inc.
516.	ABBA	If It Wasn't For The Nights	SR0000010318	UMG Recordings, Inc.
517.	ABBA	I've Been Waiting For You	SR0000303039	UMG Recordings, Inc.
518.	ABBA	Knowing Me, Knowing You	N000038737; SR0000814798	UMG Recordings, Inc.
519.	ABBA	Lay All Your Love On Me	SR0000024153	UMG Recordings, Inc.
520.	ABBA	Mamma Mia	N00000026084	UMG Recordings, Inc.
521.	ABBA	Money, Money, Money	N000038737 / SR0000814798	UMG Recordings, Inc.
522.	ABBA	My Love, My Life	N000038737 / SR0000814798	UMG Recordings, Inc.
523.	ABBA	On And On And On	SR0000024153	UMG Recordings, Inc.
524.	ABBA	One Of Us	SR0000031826	UMG Recordings, Inc.
525.	ABBA	Our Last Summer	SR0000024153	UMG Recordings, Inc.
526.	ABBA	Ring Ring	SR0000040286 / SR0000303049	UMG Recordings, Inc.
527.	ABBA	S.O.S.	N00000024436	UMG Recordings, Inc.
528.	ABBA	Slipping Through My Fingers	SR0000031826	UMG Recordings, Inc.
529.	ABBA	So Long	SR0000040286	UMG Recordings, Inc.
530.	ABBA	Summer Night City	SR0000010318	UMG Recordings, Inc.
531.	ABBA	Super Trouper	SR0000024153	UMG Recordings, Inc.
532.	ABBA	Take A Chance On Me	SR0000000071	UMG Recordings, Inc.
533.	ABBA	Thank You For The Music	SR0000000071	UMG Recordings, Inc.
534.	ABBA	The Day Before You Came	SR0000039662	UMG Recordings, Inc.
535.	ABBA	The Name Of The Game	SR0000000071	UMG Recordings, Inc.

536.	ABBA	The Winner Takes It All	SR0000054688	UMG Recordings, Inc.
537.	ABBA	Voulez-Vous	SR0000010318	UMG Recordings, Inc.
538.	ABBA	Waterloo	N00000016810 / RE0000867304	UMG Recordings, Inc.
539.	ABBA	When All Is Said And Done	SR0000031826	UMG Recordings, Inc.
540.	ABBA	When I Kissed The Teacher	N000038737/ SR0000814798	UMG Recordings, Inc.
541.	ABBA	Why Did It Have To Be Me?	N00000038737	UMG Recordings, Inc.
542.	B.B. King	The Thrill is Gone	Pre-1972 Sound Recording (ISRC - USUM70608474)	UMG Recordings, Inc.
543.	Bill Haley & His Comets	(We're Gonna) Rock Around The Clock	2021-04-08 - USMC15486163	UMG Recordings, Inc.
544.	Blink-182	A New Hope	SR0000243969	UMG Recordings, Inc.
545.	Blink-182	Adam's Song	SR0000279826	UMG Recordings, Inc.
546.	Blink-182	After Midnight	SR0000685509	UMG Recordings, Inc.
547.	Blink-182	Aliens Exist	SR0000279826	UMG Recordings, Inc.
548.	Blink-182	All Of This	SR0000345359	UMG Recordings, Inc.
549.	Blink-182	All The Small Things	SR0000279826	UMG Recordings, Inc.
550.	Blink-182	Always	SR0000345359	UMG Recordings, Inc.
551.	Blink-182	Anthem	SR0000279826	UMG Recordings, Inc.
552.	Blink-182	Anthem Pt. 2	SR0000301317	UMG Recordings, Inc.
553.	Blink-182	Apple Shampoo	SR0000243969	UMG Recordings, Inc.
554.	Blink-182	Asthenia	SR0000345359	UMG Recordings, Inc.
555.	Blink-182	Boring	SR0000243969	UMG Recordings, Inc.
556.	Blink-182	Dammit	SR0000243969	UMG Recordings, Inc.
557.	Blink-182	Degenerate	SR0000243969	UMG Recordings, Inc.
558.	Blink-182	Dick Lips	SR0000243969	UMG Recordings, Inc.
559.	Blink-182	Don't Leave Me	SR0000279826	UMG Recordings, Inc.
560.	Blink-182	Down	SR0000345359	UMG Recordings, Inc.

561.	Blink-182	Dumpweed	SR0000279826	UMG Recordings, Inc.
562.	Blink-182	Dysentery Gary	SR0000279826	UMG Recordings, Inc.
563.	Blink-182	Easy Target	SR0000345359	UMG Recordings, Inc.
564.	Blink-182	Emo	SR0000243969	UMG Recordings, Inc.
565.	Blink-182	Enthused	SR0000243969	UMG Recordings, Inc.
566.	Blink-182	Even If She Falls	SR0000685509	UMG Recordings, Inc.
567.	Blink-182	Every Time I Look For You	SR0000301317	UMG Recordings, Inc.
568.	Blink-182	Feeling This	SR0000345359	UMG Recordings, Inc.
569.	Blink-182	Fighting The Gravity	SR0000685509	UMG Recordings, Inc.
570.	Blink-182	First Date	SR0000301317	UMG Recordings, Inc.
571.	Blink-182	Ghost On The Dance Floor	SR0000685509	UMG Recordings, Inc.
572.	Blink-182	Give Me One Good Reason	SR0000301317	UMG Recordings, Inc.
573.	Blink-182	Go	SR0000345359	UMG Recordings, Inc.
574.	Blink-182	Going Away To College	SR0000279826	UMG Recordings, Inc.
575.	Blink-182	Happy Holidays, You Bastard	SR0000301317	UMG Recordings, Inc.
576.	Blink-182	Heart's All Gone	SR0000685509	UMG Recordings, Inc.
577.	Blink-182	Here's Your Letter	SR0000345359	UMG Recordings, Inc.
578.	Blink-182	I Miss You	SR0000345359	UMG Recordings, Inc.
579.	Blink-182	I Won't Be Home For Christmas	SR0000303924	UMG Recordings, Inc.
580.	Blink-182	I'm Lost Without You	SR0000345359	UMG Recordings, Inc.
581.	Blink-182	I'm Sorry	SR0000243969	UMG Recordings, Inc.
582.	Blink-182	Josie	SR0000243969	UMG Recordings, Inc.
583.	Blink-182	Kaleidoscope	SR0000685509	UMG Recordings, Inc.
584.	Blink-182	Lemmings	SR0000243969	UMG Recordings, Inc.
585.	Blink-182	Love Is Dangerous	SR0000685509	UMG Recordings, Inc.

586.	Blink-182	Man Overboard	SR0000214761	UMG Recordings, Inc.
587.	Blink-182	MH 4.18.2011	SR0000685509	UMG Recordings, Inc.
588.	Blink-182	Mutt	SR0000279826	UMG Recordings, Inc.
589.	Blink-182	Natives	SR0000685509	UMG Recordings, Inc.
590.	Blink-182	Obvious	SR0000345359	UMG Recordings, Inc.
591.	Blink-182	Online Songs	SR0000301317	UMG Recordings, Inc.
592.	Blink-182	Pathetic	SR0000243969	UMG Recordings, Inc.
593.	Blink-182	Please Take Me Home	SR0000301317	UMG Recordings, Inc.
594.	Blink-182	Reckless Abandon	SR0000301317	UMG Recordings, Inc.
595.	Blink-182	Roller Coaster	SR0000301317	UMG Recordings, Inc.
596.	Blink-182	Shut Up	SR0000301317	UMG Recordings, Inc.
597.	Blink-182	Snake Charmer	SR0000685509	UMG Recordings, Inc.
598.	Blink-182	Stay Together For The Kids	SR0000301317	UMG Recordings, Inc.
599.	Blink-182	Stockholm Syndrome	SR0000345359	UMG Recordings, Inc.
600.	Blink-182	Story Of A Lonely Guy	SR0000301317	UMG Recordings, Inc.
601.	Blink-182	The Party Song	SR0000279826	UMG Recordings, Inc.
602.	Blink-182	The Rock Show	SR0000301317	UMG Recordings, Inc.
603.	Blink-182	This Is Home	SR0000685509	UMG Recordings, Inc.
604.	Blink-182	Untitled	SR0000243969	UMG Recordings, Inc.
605.	Blink-182	Up All Night	SR0000685510	UMG Recordings, Inc.
606.	Blink-182	Violence	SR0000345359	UMG Recordings, Inc.
607.	Blink-182	Voyeur	SR0000243969	UMG Recordings, Inc.
608.	Blink-182	Waggy	SR0000243969	UMG Recordings, Inc.
609.	Blink-182	Wendy Clear	SR0000279826	UMG Recordings, Inc.
610.	Blink-182	What'S My Age Again?	SR0000279826	UMG Recordings, Inc.

611.	Blink-182	Wishing Well	SR0000685509	UMG Recordings, Inc.
612.	Chuck Berry	Johnny B. Goode	Pre-1972 Recording (indexed 2019-03-25)	UMG Recordings, Inc.
613.	DaBaby	Pop Star (feat. Kevin Gates)	SR0000866566	UMG Recordings, Inc.
614.	Enrique Iglesias	Hero	SR0000303794	UMG Recordings, Inc.
615.	Frou Frou	Let Go	SR0000322873	UMG Recordings, Inc.
616.	Gloria Gaynor	I Will Survive	SR0000004986 / SR0000010931	UMG Recordings, Inc.
617.	James Brown	I Got You (I Feel Good)	2019-11-26 - USPR36809924	UMG Recordings, Inc.
618.	James Brown & The Famous Flames	I Got You (I Feel Good)	2019-11-26 - USPR36807121; USF066825010; USF066625050	UMG Recordings, Inc.
619.	Jerry Lee Lewis	Great Balls Of Fire	Pre-1972 Recording (indexed 2022-07-12 - USIR20400813)	UMG Recordings, Inc.
620.	Pop Smoke	For The Night (feat. Lil Baby & DaBaby)	SR0000886562	UMG Recordings, Inc.
621.	Smokey Robinson & The Miracles	The Tracks of My Tears	2020-03-26 - USMO16500449; USMO16500499; USMO16572026; USWWW0142397	UMG Recordings, Inc.
622.	Stevie Wonder	Superstition	N00000003886; RE0000852322	UMG Recordings, Inc.
623.	The Temptations	My Girl	UMG filed 6.10.2019 - USMO16490001	UMG Recordings, Inc.
624.	Ed Sheeran	Shape of You	SR0000804886	Warner Music International Services Limited
625.	Jason Derulo	Colors (Coca-Cola® Anthem, 2018 FIFA World Cup™)	SR0000939790	Warner Records Inc.
626.	Jason Derulo	Don't Wanna Go Home	SR0000693162	Warner Records Inc.
627.	Jason Derulo	Get Ugly	SR0000774211	Warner Records Inc.
628.	Jason Derulo	If It Ain't Love	SR0000775353	Warner Records Inc.
629.	Jason Derulo	In My Head	SR0000685175	Warner Records Inc.
630.	Jason Derulo	It Girl	SR0000693162	Warner Records Inc.
631.	Jason Derulo	Marry Me	SR0000763207	Warner Records Inc.
632.	Jason Derulo	Ridin' Solo	SR0000685175	Warner Records Inc.
633.	Jason Derulo	Stupid Love	SR0000763207	Warner Records Inc.
634.	Jason Derulo	Swalla (feat. Nicki Minaj & Ty Dolla \$ign)	SR0000809218	Warner Records Inc.
635.	Jason Derulo	Talk Dirty (feat. 2 Chainz)	SR0000763207	Warner Records Inc.
636.	Jason Derulo	The Other Side	SR0000763207	Warner Records Inc.
637.	Jason Derulo	Tip Toe (feat. French Montana)	SR0000875097	Warner Records Inc.
638.	Jason Derulo	Trumpets	SR0000763207	Warner Records Inc.

639.	Jason Derulo	Want to Want Me	SR0000774211	Warner Records Inc.
640.	Jason Derulo	Whatcha Say	SR0000685175	Warner Records Inc.
641.	Jason Derulo	Wiggle (feat. Snoop Dogg)	SR0000763207	Warner Records Inc.
642.	Jason Derulo x David Guetta	Goodbye (feat. Nicki Minaj & Willy William)	SR0000917911	Warner Records Inc.
643.	Michael Bublé	All I Want for Christmas Is You	SR0000704271	Warner Records Inc.
644.	Michael Bublé	Christmas (Baby Please Come Home)	SR0000704271	Warner Records Inc.
645.	Michael Bublé	Cold December Night	SR0000704271	Warner Records Inc.
646.	Michael Bublé	Everything	SR0000406982	Warner Records Inc.
647.	Michael Bublé	Feeling Good	SR0000370205	Warner Records Inc.
648.	Michael Bublé	Have Yourself a Merry Little Christmas	SR0000704271	Warner Records Inc.
649.	Michael Bublé	Haven't Met You Yet	SR0000672366	Warner Records Inc.
650.	Michael Bublé	Holly Jolly Christmas	SR0000704271	Warner Records Inc.
651.	Michael Bublé	Home	SR0000370204	Warner Records Inc.
652.	Michael Bublé	I'll Be Home for Christmas	SR0000704271	Warner Records Inc.
653.	Michael Bublé	It's a Beautiful Day	SR0000731981	Warner Records Inc.
654.	Michael Bublé	It's Beginning to Look a Lot like Christmas	SR0000704271	Warner Records Inc.
655.	Michael Bublé	Jingle Bells (feat. The Puppini Sisters)	SR0000704271	Warner Records Inc.
656.	Michael Bublé	Santa Baby	SR0000704271	Warner Records Inc.
657.	Michael Bublé	Santa Claus Is Coming to Town	SR0000704271	Warner Records Inc.
658.	Michael Bublé	Save the Last Dance for Me	SR0000370205	Warner Records Inc.
659.	Michael Bublé	Silent Night	SR0000704271	Warner Records Inc.
660.	Michael Bublé	Sway	SR0000330696	Warner Records Inc.
661.	Michael Bublé	White Christmas	SR0000944170	Warner Records Inc.
662.	Michael Bublé	Winter Wonderland (feat. Rod Stewart)	SR0000948239	Warner Records Inc.



**EXHIBIT B****Additional Suno Outputs Resembling Copyrighted Recordings****I. Style and Melody Similarity**

<b>Suno Output</b>	<b>Artist</b>	<b>Copyrighted Recording</b>	<b>Prompt</b>	<b>Relevant Timestamp</b>
<a href="#">One, Two, Three O'Clock, Four O'Clock,</a> <a href="#">r</a>	Bill Haley & His Comets	Rock Around the Clock	1954 rock and roll bill haley comets	Entire Output
<a href="#">Wun, Two, Three O'Clock, Four O'Clock,</a> <a href="#">r</a>	Bill Haley & His Comets	Rock Around the Clock	1954 rock and roll bill haley comets	Entire Output
<a href="#">One, Two, Three O'Clock, Four O'Clock,</a> <a href="#">r</a>	Bill Haley & His Comets	Rock Around the Clock	1954 rock and roll bill haley comets	Entire Output
<a href="#">Hey</a>	Bill Haley & His Comets	Rock Around the Clock	1954 rock and roll bill haley comets	Entire Output
<a href="#">Bun Two, Three O'Clock, Four O'Clock,</a> <a href="#">ro</a>	Bill Haley & His Comets	Rock Around the Clock	1954 rock and roll bill haley comets	Entire Output
<a href="#">One, Two, Three O'Clock, Four O'Clock,</a> <a href="#">r</a>	Bill Haley & His Comets	Rock Around the Clock	1954 rock and roll bill haley comets	Entire Output
<a href="#">One, Two, Three O'Clock, Four O'Clock,</a> <a href="#">r</a>	Bill Haley & His Comets	Rock Around the Clock	1954 rock and roll bill haley comets	Entire Output
<a href="#">Hey</a>	Bill Haley & His Comets	Rock Around the Clock	1954 rock and roll bill haley comets	Entire Output
<a href="#">One, Two, Three O'Clock, Four O'Clock,</a> <a href="#">r</a>	Bill Haley & His Comets	Rock Around the Clock	1954 rock and roll bill haley comets	Entire Output
<a href="#">The Thrill is Gone</a>	B.B. King	The Thrill is Gone	slow minor blues, west coast blues, 12-bar blues, king of the blues, electric guitar, gritty confident voice, 1969	0:00-0:10
<a href="#">The Thrill is Gone</a>	B.B. King	The Thrill is Gone	slow minor blues, west coast blues, 12-bar blues, king of the blues, electric guitar, gritty confident voice, 1969	0:10-0:20
<a href="#">The Thrill is Gone</a>	B.B. King	The Thrill is Gone	slow minor-key blues, west coast blues, 12-bar blues, king of the blues, electric guitar, gritty confident voice, 1969	0:03-0:06

<a href="#">The Thrill is Gone</a>	B.B. King	The Thrill is Gone	slow minor-key blues, west coast blues, 12-bar blues, king of the blues, electric guitar, gritty confident voice, 1969	0:28-0:31
<a href="#">The Thrill is Gone</a>	B.B. King	The Thrill is Gone	slow minor blues, west coast blues, 12-bar blues, king of the blues, electric guitar, gritty confident voice, 1969	0:03-0:05
<a href="#">Thriller</a>	Michael Jackson	Thriller	"post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, neverland"	0:30-0:33
<a href="#">Thriller</a>	Michael Jackson	Thriller	"post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, king of pop, falsetto"	0:10 ("dark"), 0:22 ("to scream"), 0:30 ("to freeze"), 0:42 ("no one's gonna save"), 0:45 ("fighting for your life")
<a href="#">Thriller</a>	Michael Jackson	Thriller	"post-disco pop-rock funk electronic r&b thriller"	0:34-0:36
<a href="#">Tracks of My Fears</a>	Smokey Robinson & The Miracles	The Tracks of My Tears	60s r&b / soul	0:00-0:04
<a href="#">My Girl</a>	The Temptations	My Girl	1960s soul	0:07-0:10 (bass line)
<a href="#">My Girl</a>	The Temptations	My Girl	60s soul	0:00-0:04 ("I got sunshine")
<a href="#">My Girl</a>	The Temptations	My Girl	1960s soul	0:11-0:13 ("I guess you'd say")
<a href="#">My Girl</a>	The Temptations	My Girl	1960s soul	0:59-1:01 ("talkin' 'bout")
<a href="#">My Girl</a>	The Temptations	My Girl	1960s soul, motown, happy, melodic, romantic, warm, optimistic, sentimental, male vocalist, lush, love, rhythmic, vocal	0:18-0:20 ("talkin' 'bout my girl")
<a href="#">Lets Go</a>	Frou Frou	Let Go	Electropop	0:00-0:03
<a href="#">Michael Jackson Bad</a>	Stevie Wonder	Superstition	rock and roll 60s	0:00-0:09, 0:21-0:31, etc. (accompaniment riff)
<a href="#">Girl, You Know I Want Your Love</a>	Ed Sheeran	Shape of You	Pop, male singer songwriter [sic], artist that rhymes with fred sheeran, tropical house, minor	Entire Output
<a href="#">Heroes</a>	Enrique Iglesias	Hero	Latin pop	0:00-0:05
<a href="#">Deep Down in Louisiana Close to New Orle</a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output

<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output

<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output

<a href="#"><u>Deep Down in Louisiana Close to New Orle</u></a>	Chuck Berry	Johnny B. Good	1950s rock and roll, rhythm & blues, 12 bar blues, rockabilly, energetic male vocalist, singer guitarist	Entire Output
<a href="#"><u>You Shake My Nerves and You Rattle My Br</u></a>	Jerry Lee Lewis	Great Balls of Fire	1950s rock and roll, jerry lee lewis, sun studio	0:00-0:16
<a href="#"><u>You Shake My Nerves and You Rattle My Br</u></a>	Jerry Lee Lewis	Great Balls of Fire	1950s rock and roll, jerry lee lewis, sun studio	0:00-0:15
<a href="#"><u>You Shake My Nerves and You Rattle My Br</u></a>	Jerry Lee Lewis	Great Balls of Fire	1950s rock and roll, jerry lee lewis, sun studio	0:00-0:19
<a href="#"><u>You Shake My Nerves and You Rattle My Br</u></a>	Jerry Lee Lewis	Great Balls of Fire	1950s rock and roll, jerry lee lewis, sun studio	0:00-0:14
<a href="#"><u>You Shake My Nerves and You Rattle My Br</u></a>	Jerry Lee Lewis	Great Balls of Fire	1950s rock and roll, jerry lee lewis, sun studio	0:00-0:16
<a href="#"><u>You Shake My Nerves and You Rattle My Br</u></a>	Jerry Lee Lewis	Great Balls of Fire	1950s rock and roll, jerry lee lewis, sun studio	0:00-0:13
<a href="#"><u>You Shake My Nerves and You Rattle My Br</u></a>	Jerry Lee Lewis	Great Balls of Fire	1950s rock and roll, jerry lee lewis, sun studio	0:00-0:16
<a href="#"><u>You Shake My Nerves and You Rattle My Br</u></a>	Jerry Lee Lewis	Great Balls of Fire	1950s rock and roll, jerry lee lewis, sun studio	0:00-0:24
<a href="#"><u>You Shake My Nerves and You Rattle My Br</u></a>	Jerry Lee Lewis	Great Balls of Fire	1950s rock and roll, jerry lee lewis, sun studio	0:00-0:15
<a href="#"><u>You Shake My Nerves and You Rattle My Br</u></a>	Jerry Lee Lewis	Great Balls of Fire	1950s rock and roll, jerry lee lewis, sun studio	0:00-0:19
<a href="#"><u>Oh, keep your eyes on the road, your han</u></a>	The Doors	Roadhouse Blues	1970 blues rock doors psychedelic rock los angeles jim morrison, kings of acid rock	0:00-0:08
<a href="#"><u>When marimba rhythms start to play</u></a>	Michael Bublé	Sway	2004 canadian male singer jazz pop sway latin big band	0:07-0:18 0:24-0:34
<a href="#"><u>When marimba rhythms start to play</u></a>	Michael Bublé	Sway	2004 canadian male singer jazz pop sway latin big band	0:00-0:20 0:28-0:53

<a href="#"><u>When marimba start to play</u></a>	Michael Bublé	Sway	2004 canadian smooth male singer jazz pop buble sway latin big band	0:00-0:27 0:31-0:37
<a href="#"><u>When marimba rhythms start to play</u></a>	Michael Bublé	Sway	2004 canadian smooth male singer jazz pop buble sway latin big band	0:08-0:45
<a href="#"><u>When marimba rhythms start to play</u></a>	Michael Bublé	Sway	canadian smooth male singer 2004 jazz pop buble sway latin big band	0:05-0:21 0:25-0:30
<a href="#"><u>When marimba rhythms start to play</u></a>	Michael Bublé	Sway	canadian smooth male singer 2004 jazz pop buble sway latin big band	0:01-0:22
<a href="#"><u>When marimba rhythms start to play</u></a>	Michael Bublé	Sway	canadian smooth male singer 2004 jazz pop buble sway latin big band mambo	0:04-0:29
<a href="#"><u>When marimba rhythms start to play</u></a>	Michael Bublé	Sway	canadian smooth male singer 2004 jazz pop buble sway latin big band mambo	0:04-08 0:11-0:28
<a href="#"><u>When marimba rhythms start to play</u></a>	Michael Bublé	Sway	canadian smooth male singer 2004 jazz pop buble sway latin mambo	0:09-0:28
<a href="#"><u>When marimba rhythms start to play</u></a>	Michael Bublé	Sway	canadian smooth male singer 2004 jazz pop buble sway latin mambo	0:09-0:44
<a href="#"><u>When marimba rhythms start to play</u></a>	Michael Bublé	Sway	canadian smooth male singer 2004 jazz pop buble sway latin mambo minor key	0:08-0:42



## II. Style Similarity

Suno Output	Vocals	Prompt	Relevant Timestamp
<a href="#">Abba – Thank Abba for the Music</a>	ABBA	pop + abba 80s 70s + uptempo	Entire Output
<a href="#">Prancing Queen</a>	ABBA	70s pop	Entire Output
<a href="#">I don't wanna talk</a>	ABBA	70s swedish europop, melancholic breakup ballad	Entire Output
<a href="#">Yesterday</a>	The Beatles	60s british pop rock, liverpool, abbey road	Entire Output
<a href="#">Yesterday</a>	The Beatles	60s british pop rock, liverpool, abbey road	Entire Output
<a href="#">Yesterday</a>	The Beatles	60s british pop rock, liverpool, abbey road	Entire Output
<a href="#">Yesterday</a>	The Beatles	60s british pop rock, liverpool, abbey road	Entire Output
<a href="#">Thriller</a>	Michael Jackson	post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, neverland	Entire Output
<a href="#">Thriller</a>	Michael Jackson	post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, king of pop, falsetto	Entire Output
<a href="#">Thriller</a>	Michael Jackson	post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, king of pop, falsetto	Entire Output
<a href="#">Thriller</a>	Michael Jackson	post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, king of pop, falsetto	Entire Output
<a href="#">Thriller</a>	Michael Jackson	post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, king of pop, falsetto	Entire Output
<a href="#">Thriller</a>	Michael Jackson	post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, king of pop, falsetto	Entire Output
<a href="#">Thriller</a>	Michael Jackson	post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, king of pop, falsetto	Entire Output
<a href="#">Thriller</a>	Michael Jackson	post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, king of pop, falsetto	Entire Output
<a href="#">Thriller</a>	Michael Jackson	post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, king of pop	Entire Output
<a href="#">Thriller</a>	Michael Jackson	post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, king of pop	Entire Output
<a href="#">Thriller</a>	Michael Jackson	post-disco, pop-rock, funk, electronic, r&b, thriller, motown, famous male singer and dancer, king of pop	Entire Output

<a href="#">The Anthem</a>	Blink-182	a song by a band named blink-182	Entire Output
<a href="#">Sittin' in the mornin' sun</a>	Otis Redding	southern soul, deep soul, male vocalist, greatest soul singer of the 60s, mellow	Entire Output
<a href="#">Sittin in the mornin' sun</a>	Otis Redding	southern soul, deep soul, male vocalist, greatest soul singer of the 60s, mellow	Entire Output
<a href="#">Well</a>	Ray Charles	1954 ray rhythm and blues charles energetic fast atlanta	Entire Output
<a href="#">Well</a>	Ray Charles	1954 rhythm and blues ray	Entire Output
<a href="#">Well</a>	Ray Charles	1954 ray rhythm and blues charles atlanta	Entire Output
<a href="#">Well</a>	Ray Charles	1954 ray rhythm and blues charles atlanta	Entire Output
<a href="#">Well</a>	Ray Charles	1954 ray rhythm and blues charles	Entire Output
<a href="#">Well, I got a woman, way over town</a>	Ray Charles	ray charles rhythm & blues soul 1954 atlantic georgia wexler	Entire Output
<a href="#">Well, I got a woman, way over town</a>	Ray Charles	ray charles rhythm & blues soul 1954 atlantic georgia	Entire Output
<a href="#">Well, I got a woman, way over town</a>	Ray Charles	ray charles rhythm & blues soul 1954 gospel frenetic atlanta georgia wexler	Entire Output
<a href="#">Well, I got a woman, way over town</a>	Ray Charles	ray charles rhythm & blues soul 12 bar 1959	Entire Output
<a href="#">Well, I got a woman, way over town</a>	Ray Charles	ray charles rhythm & blues soul 1954 gospel frenetic atlanta My Jesus Is All the World to Me	Entire Output
<a href="#">Hey mama, don't you treat me wrong</a>	Ray Charles	ray charles rhythm & blues soul 12 bar 1959	Entire Output
<a href="#">i get around</a>	The Beach Boys	60s surf rock california beach boys	Entire Output
<a href="#">get around</a>	The Beach Boys	60s california surf rock by the beach boys	Entire Output
<a href="#">It's been a hard day's night, and I've b</a>	The Beatles	60s rock british	Entire Output
<a href="#">In the Dark</a>	Slipknot	slip knot	Entire Output
<a href="#">Well, it's a marvelous night for a moond</a>	Michael Bublé	2003 vocal pop jazz canadian male moondance	Entire Output
<a href="#">Well, it's a marvelous night for a moond</a>	Michael Bublé	2003 vocal pop jazz canadian male moondance	Entire Output
<a href="#">Well, it's a marvelous night for a moond</a>	Michael Bublé	2003 vocal pop jazz canadian male van moondance morrison	Entire Output
<a href="#">Well, it's a marvelous night for a moond</a>	Michael Bublé	2003 vocal pop jazz canadian male van moondance morrison	Entire Output
<a href="#">Well, it's a marvelous night for a moond</a>	Michael Bublé	2003 vocal pop jazz canadian male moondance morrison	Entire Output

<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 vocal pop jazz canadian male moondance morrison	Entire Output
<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 vocal pop jazz canadian male van moondance morrison soul	Entire Output
<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 vocal pop jazz canadian male van moondance morrison	Entire Output
<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 vocal pop jazz canadian male walking bass van moondance morrison minor soul	Entire Output
<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 vocal pop jazz canadian male van moondance morrison minor soul	Entire Output
<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 vocal pop jazz canadian male van moondance morrison soul	Entire Output
<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 vocal pop jazz canadian male upbeat walking bass minor soul	Entire Output
<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 vocal pop jazz canadian male walking bass upbeat minor soul	Entire Output
<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 vocal pop jazz canadian male walking bass minor soul	Entire Output
<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 vocal pop jazz canadian male walking bass minor soul	Entire Output
<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 fast vocal pop jazz canadian male upbeat walking bass minor	Entire Output
<a href="#"><u>Well, it's a marvelous night for a moond</u></a>	Michael Bublé	2003 vocal pop jazz canadian male walking bass minor	Entire Output

# **EXHIBIT C**

**Thumb Drive of Suno-Generated  
Outputs to be Lodged  
Separately with the Court**