

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC.; CAPITOL
CMG, INC. D/B/A ARIOSE MUSIC, D/B/A
CAPITOL CMG GENESIS, D/B/A CAPITOL
CMG PARAGON, D/B/A GREG NELSON
MUSIC, D/B/A JUBILEE
COMMUNICATIONS, INC., D/B/A
MEADOWGREEN MUSIC COMPANY, D/B/A
MEAUX HITS, D/B/A MEAUX MERCY,
D/B/A RIVER OAKS MUSIC, D/B/A
SHEPHERD’S FOLD MUSIC, D/B/A
SPARROW SONG, D/B/A WORSHIP
TOGETHER MUSIC, D/B/A
WORSHIPTOGETHER.COM SONGS;
UNIVERSAL MUSIC CORP. D/B/A ALMO
MUSIC CORP., D/B/A CRITERION MUSIC
CORP., D/B/A GRANITE MUSIC CORP.,
D/B/A IRVING MUSIC, INC., D/B/A
MICHAEL H. GOLDSSEN, INC., D/B/A
UNIVERSAL – GEFFEN MUSIC, D/B/A
UNIVERSAL MUSIC WORKS; SONGS OF
UNIVERSAL, INC. D/B/A UNIVERSAL –
GEFFEN AGAIN MUSIC, D/B/A UNIVERSAL
TUNES; UNIVERSAL MUSIC – MGB NA
LLC D/B/A MULTISONGS, D/B/A
UNIVERSAL MUSIC – CAREERS, D/B/A
UNIVERSAL MUSIC – MGB SONGS;
POLYGRAM PUBLISHING, INC. D/B/A
UNIVERSAL – POLYGRAM
INTERNATIONAL TUNES, INC., D/B/A
UNIVERSAL – POLYGRAM
INTERNATIONAL PUBLISHING, INC.,
D/B/A UNIVERSAL – SONGS OF
POLYGRAM INTERNATIONAL, INC.;
UNIVERSAL MUSIC – Z TUNES LLC D/B/A
NEW SPRING PUBLISHING, D/B/A
UNIVERSAL MUSIC – BRENTWOOD
BENSON PUBLISHING, D/B/A UNIVERSAL
MUSIC – BRENTWOOD BENSON SONGS,
D/B/A UNIVERSAL MUSIC – BRENTWOOD
BENSON TUNES, D/B/A UNIVERSAL
MUSIC – Z MELODIES, D/B/A UNIVERSAL

Case No. _____

**COMPLAINT AND
DEMAND FOR JURY TRIAL**

MUSIC – Z SONGS; and ABKCO MUSIC,
INC.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Plaintiffs Concord Music Group, Inc.; Capitol CMG, Inc. d/b/a Ariose Music, d/b/a Capitol CMG Genesis, d/b/a Capitol CMG Paragon, d/b/a Greg Nelson Music, d/b/a Jubilee Communications, Inc., d/b/a Meadowgreen Music Company, d/b/a Meaux Hits, d/b/a Meaux Mercy, d/b/a River Oaks Music, d/b/a Shepherd’s Fold Music, d/b/a Sparrow Song, d/b/a Worship Together Music, d/b/a Worshiptogether.com Songs; Universal Music Corp. d/b/a Almo Music Corp., d/b/a Criterion Music Corp., d/b/a Granite Music Corp., d/b/a Irving Music, Inc., d/b/a Michael H. Goldsen, Inc., d/b/a Universal – Geffen Music, d/b/a Universal Music Works; Songs of Universal, Inc. d/b/a Universal – Geffen Again Music, d/b/a Universal Tunes; Universal Music – MGB NA LLC d/b/a Multisongs, d/b/a Universal Music – Careers, d/b/a Universal Music – MGB Songs; Polygram Publishing, Inc. d/b/a Universal – Polygram International Tunes, Inc., d/b/a Universal – Polygram International Publishing, Inc., d/b/a Universal – Songs of Polygram International, Inc.; Universal Music – Z Tunes LLC d/b/a New Spring Publishing, d/b/a Universal Music – Brentwood Benson Publishing, d/b/a Universal Music – Brentwood Benson Songs, d/b/a Universal Music – Brentwood Benson Tunes, d/b/a Universal Music – Z Melodies, d/b/a Universal Music – Z Songs; and ABKCO Music, Inc. (collectively, “Publishers”), for their complaint against Defendant Anthropic PBC (“Anthropic”),

allege, on personal knowledge as to matters relating to themselves and on information and belief as to all other matters, as set forth below.

NATURE OF THE CASE

1. Publishers bring this action to address the systematic and widespread infringement of their copyrighted song lyrics by the artificial intelligence (“AI”) company Anthropic. In the process of building and operating AI models, Anthropic unlawfully copies and disseminates vast amounts of copyrighted works—including the lyrics to myriad musical compositions owned or controlled by Publishers. Publishers embrace innovation and recognize the great promise of AI when used ethically and responsibly. But Anthropic violates these principles on a systematic and widespread basis. Anthropic must abide by well-established copyright laws, just as countless other technology companies regularly do.

2. Although the AI technology involved in this case may be complex and cutting-edge, the legal issues presented here are straightforward and long-standing. A defendant cannot reproduce, distribute, and display someone else’s copyrighted works to build its own business unless it secures permission from the rightsholder. This foundational rule of copyright law dates all the way back to the Statute of Anne in 1710, and it has been applied time and time again to numerous infringing technological developments in the centuries since. That principle does not fall away simply because a company adorns its infringement with the words “AI.” Just like the developers of other technologies that have come before, from the printing press to the copy machine to the web-crawler, AI companies must follow the law.

3. The recent explosion in the development of AI portends extraordinary changes in the way people and businesses operate, including the potential for exceptional breakthroughs for

the music and entertainment industries. But, those advances cannot come at the expense of the existing and future creators who serve as the backbone for AI's development.

4. Publishers are among the world's leading music publishers. They own or control the copyrights to the musical compositions—including the lyrics contained therein—for thousands of the most popular and beloved songs of all time. Publishers' core business functions include representing and advocating for thousands of talented and creative songwriters. Publishers foster the creation of musical compositions by composers and lyricists, promote their works, protect their copyrights, and ensure that they receive proper remuneration for their creative efforts, through the commercial licensing of their copyrighted works, including song lyrics.

5. Music is rooted in creativity and innovation. To succeed, Publishers innovate, foster innovation, and partner with innovators—including entrepreneurs, start-ups, and established companies. Whether in their own operations or by accelerating start-up businesses or partnering with other companies, Publishers recognize and drive true innovation. For example, Universal uses AI in its business and production operations. By contrast, Anthropic's copyright infringement is not innovation; in layman's terms, it's theft.

6. Anthropic is in the business of developing, operating, selling, and licensing AI technologies. Its primary product is a series of AI models referred to as "Claude." Anthropic builds its AI models by scraping and ingesting massive amounts of text from the internet and potentially other sources, and then using that vast corpus to train its AI models and generate output based on this copied text. Included in the text that Anthropic copies to fuel its AI models are the lyrics to innumerable musical compositions for which Publishers own or control the copyrights, among countless other copyrighted works harvested from the internet. This

copyrighted material is not free for the taking simply because it can be found on the internet. Anthropic has neither sought nor secured Publishers' permission to use their valuable copyrighted works in this way. Just as Anthropic does not want its code taken without its authorization, neither do music publishers or any other copyright owners want their works to be exploited without permission.

7. Anthropic claims to be different from other AI businesses. It calls itself an AI “safety and research” company, and it claims that, by training its AI models using a so-called “constitution,” it ensures that those programs are more “helpful, honest, and harmless.” Yet, despite its purportedly principled approach, Anthropic infringes on copyrights without regard for the law or respect for the creative community whose contributions are the backbone of Anthropic’s infringing service.

8. As a result of Anthropic’s mass copying and ingestion of Publishers’ song lyrics, Anthropic’s AI models generate identical or nearly identical copies of those lyrics, in clear violation of Publishers’ copyrights. When a user prompts Anthropic’s Claude AI chatbot to provide the lyrics to songs such as “A Change Is Gonna Come,” “God Only Knows,” “What a Wonderful World,” “Gimme Shelter,” “American Pie,” “Sweet Home Alabama,” “Every Breath You Take,” “Life Is a Highway,” “Somewhere Only We Know,” “Halo,” “Moves Like Jagger,” “Uptown Funk,” or any other number of Publishers’ musical compositions, the chatbot will provide responses that contain all or significant portions of those lyrics.

9. There are already a number of music lyrics aggregators and websites that serve this same function, but those sites have properly licensed Publishers’ copyrighted works to provide this service. Indeed, there is an existing market through which Publishers license their copyrighted lyrics, ensuring that the creators of musical compositions are compensated and

credited for such uses. By refusing to license the content it is copying and distributing, Anthropic is depriving Publishers and their songwriters of control over their copyrighted works and the hard-earned benefits of their creative endeavors, it is competing unfairly against those website developers that respect the copyright law and pay for licenses, and it is undermining existing and future licensing markets in untold ways.

10. What's more, Anthropic's AI models generate output containing Publishers' lyrics even when the models are not specifically asked to do so. Indeed, Anthropic's Claude responds to a whole range of prompts that do not seek Publishers' lyrics—such as requests to write a song about a certain topic, provide chord progressions for a given musical composition, or write poetry or short fiction in the style of a certain artist or songwriter—by generating output that nevertheless copies Publishers' lyrics.

11. By copying and exploiting Publishers' lyrics in this manner—both as the input it uses to train its AI models and as the output those AI models generate—Anthropic directly infringes Publishers' exclusive rights as copyright holders, including the rights of reproduction, preparation of derivative works, distribution, and public display. In addition, because Anthropic unlawfully enables, encourages, and profits from massive copyright infringement by its users, it is secondarily liable for the infringing acts of its users under well-established theories of contributory infringement and vicarious infringement. Moreover, Anthropic's AI output often omits critical copyright management information regarding these works, in further violation of Publishers' rights; in this respect, the composers of the song lyrics frequently do not get recognition for being the creators of the works that are being distributed. It is unfathomable for Anthropic to treat itself as exempt from the ethical and legal rules it purports to embrace.

12. Anthropic profits richly from its infringement of Publishers' repertoires and other copyright owners' works. Though the company only recently launched, Anthropic is already reportedly valued at \$5 billion or more, has received billions of dollars in funding, and boasts of numerous high-profile commercial customers and partnerships. None of that would be possible without the vast troves of copyrighted material that Anthropic scrapes from the internet and exploits as the input and output for its AI models. Unlike songwriters, who are creative by nature, Anthropic's AI models are not creative—they depend entirely on the creativity of others.

13. Yet, Anthropic pays nothing to Publishers, their songwriters, or the countless other copyright owners whose copyrighted works Anthropic uses to train its AI models. Anthropic has never even attempted to license the use of Publishers' lyrics.

14. Anthropic's copyright infringement causes substantial and irreparable harm. Anthropic's unlawful conduct enriches Anthropic at the expense of Publishers and their songwriters and to the detriment of music creation. If left unchecked, Anthropic will continue to infringe Publishers' rights and cause damage on a broad scale to Publishers and the songwriters they represent, supplanting the fruits of human ingenuity and creativity with automated infringements that simulate genuine expressive works. Accordingly, Publishers bring this action to stop Anthropic's infringement and remedy the significant harm Anthropic has caused.

JURISDICTION AND VENUE

15. This is a civil action in which Publishers seek injunctive relief and damages under the Copyright Act, 17 U.S.C. § 101, *et seq.* As such, the Court has original subject matter jurisdiction over Publishers' copyright infringement claims pursuant to 28 U.S.C. §§ 1331 and 1338(a).

16. This Court has specific personal jurisdiction over Anthropic pursuant to Tenn. Code Ann. § 20-2-214. Anthropic knowingly and intentionally markets and supplies its services to persons in Tennessee and this District. Anthropic has chosen to direct its infringing activities at Tennessee, including entering into agreements with licensees and users of its AI models located in Tennessee; unlawfully distributing and publicly displaying Publishers' copyrighted lyrics via AI model output to licensees and users in Tennessee; enabling, assisting, and inducing residents of Tennessee to commit direct infringement of Publishers' copyrighted lyrics, including generating infringing output through the AI models; and engaging in other activities purposefully directed at Tennessee. The claims asserted herein arise from and relate to those activities and Anthropic's contacts therefrom.

17. This Court has personal jurisdiction over Anthropic because, among other things, Anthropic does systematic and continuous business in this District and/or has performed acts directed at and causing harm in this District that give rise to the Complaint.

18. Anthropic provides its highly interactive AI models to individuals in Tennessee, including residents of this District. Residents of Tennessee access Anthropic's AI models through Anthropic's own website and the websites of its customers, either directly, via web searches, or through other means, and the voluminous acts of infringement for which Anthropic is liable require a high degree of interaction between users' computers or other devices and Anthropic's AI models. Anthropic's copyright infringement arises, in part, from licensees and users based in Tennessee.

19. Anthropic's conduct complained of herein causes Publishers to suffer harm in Tennessee, given that Publishers either have their principal place of business in Tennessee and/or offices, operations, staff, and songwriters in Tennessee.

20. Venue is proper in this District in accordance with 28 U.S.C. §§ 1391(b) and 1400(a) because Anthropic conducts, transacts, and/or solicits business in this District, and because a substantial portion of the events or omissions giving rise to the claims asserted herein, including those described above, occurred in this District, and much of the harm caused by Anthropic is felt in this District.

THE PARTIES

Plaintiff Concord

21. Plaintiff Concord Music Group, Inc. (“Concord”) is a Delaware corporation with its principal place of business in Nashville, Tennessee.

22. Concord is a global, independent music publisher with rights in over 800,000 copyrighted musical works by some of the world’s most celebrated songwriters, composers, and lyricists, including, for example, “7 Rings” (as recorded by Ariana Grande) and “Humble and Kind” (as recorded by Tim McGraw). Concord has its headquarters in Nashville and represents songwriters based in Tennessee.

Plaintiff Universal

23. Plaintiff Capitol CMG, Inc. d/b/a Ariose Music, d/b/a Capitol CMG Genesis, d/b/a Capitol CMG Paragon, d/b/a Greg Nelson Music, d/b/a Jubilee Communications, Inc., d/b/a Meadowgreen Music Company, d/b/a Meaux Hits, d/b/a Meaux Mercy, d/b/a River Oaks Music, d/b/a Shepherd’s Fold Music, d/b/a Sparrow Song, d/b/a Worship Together Music, d/b/a Worshiptogether.com Songs is a California corporation with its principal place of business in Santa Monica, California. Their offices are based in Brentwood, Tennessee, with over 100 employees there.

24. Plaintiff Universal Music Corp. d/b/a Almo Music Corp., d/b/a Criterion Music Corp., d/b/a Granite Music Corp., d/b/a Irving Music, Inc., d/b/a Michael H. Goldsen, Inc., d/b/a Universal – Geffen Music, d/b/a Universal Music Works is a Delaware corporation with its principal place of business in Santa Monica, California.

25. Plaintiff Songs of Universal, Inc. d/b/a Universal – Geffen Again Music, d/b/a Universal Tunes is a California corporation with its principal place of business in Santa Monica, California.

26. Plaintiff Universal Music – MGB NA LLC d/b/a Multisongs, d/b/a Universal Music – Careers, d/b/a Universal Music – MGB Songs is a California limited liability company with its principal place of business in Santa Monica, California.

27. Plaintiff Polygram Publishing, Inc. d/b/a Universal – Polygram International Tunes, Inc., d/b/a Universal – Polygram International Publishing, Inc., d/b/a Universal – Songs of Polygram International Inc. is a Delaware corporation with its principal place of business in Santa Monica, California.

28. Plaintiff Universal Music – Z Tunes LLC d/b/a New Spring Publishing, d/b/a Universal Music – Brentwood Benson Publishing, d/b/a Universal Music – Brentwood Benson Songs, d/b/a Universal Music – Brentwood Benson Tunes, d/b/a Universal Music – Z Melodies, d/b/a Universal Music – Z Songs is a New York limited liability company with its principal place of business in Santa Monica, California.

29. Plaintiffs Capitol CMG, Inc. d/b/a Ariose Music, d/b/a Capitol CMG Genesis, d/b/a Capitol CMG Paragon, d/b/a Greg Nelson Music, d/b/a Jubilee Communications, Inc., d/b/a Meadowgreen Music Company, d/b/a Meaux Hits, d/b/a Meaux Mercy, d/b/a River Oaks Music, d/b/a Shepherd's Fold Music, d/b/a Sparrow Song, d/b/a Worship Together Music, d/b/a

Worshiptogether.com Songs; Universal Music Corp. d/b/a Almo Music Corp., d/b/a Criterion Music Corp., d/b/a Granite Music Corp., d/b/a Irving Music, Inc., d/b/a Michael H. Goldsen, Inc., d/b/a Universal – Geffen Music, d/b/a Universal Music Works; Songs of Universal, Inc. d/b/a Universal – Geffen Again Music, d/b/a Universal Tunes; Universal Music – MGB NA LLC d/b/a Multisongs, d/b/a Universal Music – Careers, d/b/a Universal Music – MGB Songs; Polygram Publishing, Inc. d/b/a Universal – Polygram International Tunes, Inc., d/b/a Universal – Polygram International Publishing, Inc., d/b/a Universal – Songs of Polygram International, Inc.; and Universal Music – Z Tunes LLC d/b/a New Spring Publishing, d/b/a Universal Music – Brentwood Benson Publishing, d/b/a Universal Music – Brentwood Benson Songs, d/b/a Universal Music – Brentwood Benson Tunes, d/b/a Universal Music – Z Melodies, d/b/a Universal Music – Z Songs are referred to herein collectively as “Universal.”

30. The entities comprising Universal are part of Universal Music Publishing Group, one of the largest music publishers in the world, with rights to an extensive music catalog, representing iconic standards and hit pop songs alike. Universal Music Publishing Group has an office in Nashville and represents songwriters based in Tennessee.

Plaintiff ABKCO

31. Plaintiff ABKCO Music, Inc. (“ABKCO”) is a New York corporation with its principal place of business in New York, New York.

32. ABKCO is a leading independent music publisher. Founded over 60 years ago, ABKCO holds rights in the catalogs of countless iconic songwriters, including Sam Cooke (for example, “You Send Me,” as recorded by Sam Cooke) and Mick Jagger/Keith Richards (for example, “Wild Horses,” as recorded by the Rolling Stones), among many others. ABKCO represents songwriters based in Tennessee.

Defendant Anthropic

33. Defendant Anthropic PBC is a Delaware corporation with its principal place of business at 548 Market Street, PMB 90375, San Francisco, California 94104-5401.

PUBLISHERS AND THEIR COPYRIGHTS

34. Publishers are among the world's foremost music publishers. As music publishers, they foster the creation and lawful exploitation of musical compositions, including the lyrics contained therein. Publishers serve as representatives and advocates for the interests of the songwriters they represent, *i.e.*, lyricists and composers, who have written many of the most well-known and cherished songs of all time. Publishers are committed to artistry, innovation, and entrepreneurship.

35. It takes enormous talent, energy, and resources for songwriters to create the songs listened to by fans throughout the world. Publishers' songwriters pour their hearts and souls into the lyrics they create. Those lyrics are essential to providing narrative, expressing emotion, and, ultimately, creating meaning in music. Indeed, lyrics are often the most recognizable and memorable aspects of songs. Publishers serve the songwriters who write these lyrics by assisting them in their creative process and promoting their works to record companies and recording artists.

36. Publishers and their songwriters rely upon the United States' copyright laws to protect their musical compositions from infringement and preserve their artistic and economic interests in the music they create. Publishers' financial incentives to invest in songwriters and the creation and promotion of their musical compositions flow directly from the protections afforded by copyright. Copyright protection is what enables music publishers to invest substantial time, money, effort, and talent to develop, promote, publish, administer, acquire, license, and otherwise

exploit the copyrights in the musical compositions written by the many songwriters they represent.

37. Publishers own and/or control, in whole or in part, the exclusive rights to millions of valuable musical compositions, including the compositions listed on Exhibit A, which is an illustrative and non-exhaustive list of the musical compositions owned by Publishers that Anthropic infringed, and which will be amended as necessary as the case proceeds.

38. Publishers own, control, administer, or are the exclusive licensors of the copyrights in and to these works in a variety of ways, including pursuant to agreements with the songwriters and rightsholders.

39. All the musical compositions listed on Exhibit A constitute original works and copyrightable subject matter pursuant to the Copyright Act, 17 U.S.C. § 101, *et seq.*, and they have been duly registered with the U.S. Copyright Office. The copyrights in the musical compositions set forth in Exhibit A remain valid and subsisting and have been owned and/or controlled by Publishers at all times relevant to the allegations in this Complaint.

40. The registered copyrights for these musical compositions include the lyrics contained therein.

41. Publishers own and/or exclusively control the rights set forth in 17 U.S.C. § 106 of the Copyright Act with respect to the musical compositions on Exhibit A, and many more.

42. Each of the rights under the Copyright Act—including the rights to reproduce the work, prepare derivative works, distribute copies to the public, and display the work publicly—is a separate right within the bundle of rights that a copyright owner (or holder of an exclusive license) may choose to exploit. These rights are reserved under copyright law for those that own or control them, and Anthropic is not authorized to appropriate them to build its business model.

43. Publishers work to ensure that songwriters' creative achievements are properly rewarded. Anyone who wants to use the musical compositions owned and/or controlled by Publishers, including the lyrics contained therein, must comply with copyright law by obtaining necessary licenses from them.

44. Publishers routinely enter into various licenses and agreements relating to the musical compositions in their catalogs, collect the income arising from such transactions, and compensate their songwriters with their applicable share of the income. Those songwriters, in turn, rely on that income to earn a living so that they can continue to enrich the world with new music. Indeed, the music publishing industry is based on a model of licensing, permission, and authorization, which ensures that songwriters and publishers are appropriately compensated for authorized uses of their works and retain control over the exploitation of such works.

45. Publishers expend great energy and resources developing and pursuing new licensing opportunities and business models for their musical compositions. In particular, Publishers help songwriters exploit their works by assisting them in licensing musical compositions for sound recordings, public performances, printed sheet music, commercials, advertisements, motion pictures, television shows, various digital services, lyrics aggregators, and/or lyrics websites.

46. Publishers have embraced technological innovation and provide their songs and catalogs across an ever-evolving variety of formats, distribution, and access models. Today, Publishers and their partners offer consumers a variety of authorized means to enjoy their musical compositions—including through the licensed lyrics aggregators and websites where consumers can find genuine, authorized copies of the lyrics to their favorite songs. Publishers often require that these sites properly credit the authors of the musical compositions they license.

47. Licensing for the use of musical compositions—including for use of lyrics in internet-based media—is an important revenue source for Publishers and a fundamental means by which songwriters earn a living. Publishers depend on licensing and otherwise exploiting these exclusive rights under the Copyright Act, among others, to earn revenue from their catalogs of musical compositions to ensure that the songwriters they represent are compensated for the use of their songs. Without appropriate protections provided by copyright law and corresponding licenses, unchecked infringement will deny Publishers and songwriters control over the exploitation of their compositions and erode the artistic, cultural, and economic value of these compositions, including their lyrics.

48. Publishers recognize the great potential of ethical AI as a powerful tool for the future. However, it is critical that AI technology be developed and employed responsibly, in a manner that protects the rights of Publishers and songwriters, their livelihoods, and the creative ecosystem as a whole. Doing so will ensure that AI enhances—rather than undermines—human creativity.

ANTHROPIC AND ITS INFRINGING CONDUCT

A. Anthropic and Its AI Business

49. Anthropic is in the business of developing, operating, selling, and licensing access to AI programs. Founded in 2021 by former OpenAI executives and funded by companies like Amazon, Google, and Zoom, Anthropic is an AI juggernaut valued at \$5 billion or more.¹ But Anthropic has built its business by unlawfully taking and using massive amounts of copyrighted content without permission or credit—including Publishers' lyrics.

¹ See, e.g., Krystal Hu and Jaiveer Shekhawat, *Google-backed Anthropic raises \$450 mln in latest AI funding*, REUTERS (May 23, 2023), <https://www.reuters.com/markets/deals/alphabet-backed-ai-startup-anthropic-raises-450-million-funding-freeze-thaws-2023-05-23/>.

50. Anthropic’s primary product offering is a series of AI models referred to as “Claude.” Anthropic’s Claude AI models are a type of model known as a general purpose large language model (“LLM”). Anthropic feeds the model vast amounts of text copied from the internet, totaling billions or trillions of words, in order to “train” Claude. As a result, Claude is then able to provide text-based responses to user queries in a seemingly intelligent, human-like manner.

51. Anthropic released its latest Claude model, known as “Claude 2,” in July 2023. Anthropic touts Claude 2 as its “most capable system yet.”² The company also offers various other iterations of its Claude AI models. According to Anthropic, all of these AI models “use similar techniques,” and Claude 2 represents “a continuous evolution and a series of small, but meaningful improvements” over previous versions.³

52. Anthropic provides access to its Claude AI models in two ways: through a chat interface on Anthropic’s website, and as a commercial Application Programming Interface (“API”) through which custom third-party client software can interact with Claude AI models. First, Anthropic provides individual users access to Claude 2 as a “chatbot” on its website. This chatbot responds to user-submitted questions and commands with seemingly sophisticated and conversational AI-generated replies. Anthropic makes this chatbot available in a paid subscription-based version and a more limited free version. Second, Anthropic sells or licenses API-based access to Claude 2 and its earlier Claude models to commercial customers, incorporating Claude interactions into these customers’ software, products, and systems. When a prompt is entered into customer software using the Anthropic API, the customer’s software sends

² *Model Card and Evaluations for Claude Models*, at 1, ANTHROPIC, <https://www-files.anthropic.com/production/images/Model-Card-Claude-2.pdf>.

³ *Id.*

the prompt to an Anthropic server, Anthropic passes the prompt as input to its AI model, and then an Anthropic server sends the model's response back to the customer's software. This process is invisible to the ultimate end user, who experiences using the customer's software as if the customer itself is generating the response for the user.

B. *Anthropic's Development of Its AI Models Generally*

53. Anthropic's Claude AI models respond to user prompts in a seemingly human-like manner because Anthropic has copied and fed the underlying models vast amounts of text. Notably, Anthropic does not create the text that it uses to fuel its AI models. Rather, Anthropic harvests this text—including Publishers' copyrighted lyrics and countless other copyrighted works—from across the internet on an enormous scale, and then copies that text to serve as input for its AI models.

54. Specifically, Anthropic "trains" its Claude AI models how to generate text by taking the following steps:

a. First, Anthropic copies massive amounts of text from the internet and potentially other sources. Anthropic collects this material by "scraping" (or copying or downloading) the text directly from websites and other digital sources and onto Anthropic's servers, using automated tools, such as bots and web crawlers, and/or by working from collections prepared by third parties, which in turn may have been harvested through web scraping. This vast collection of text forms the input, or "corpus," upon which the Claude AI model is then trained.

b. Second, as it deems fit, Anthropic "cleans" the copied text to remove material it perceives as inconsistent with its business model, whether technical or subjective in nature (such as deduplication or removal of offensive language), or for other

reasons. In most instances, this “cleaning” process appears to entirely ignore copyright infringements embodied in the copied text.

c. Third, Anthropic copies this massive corpus of previously copied text into computer memory and processes this data in multiple ways to train the Claude AI models, or establish the values of billions of parameters that form the model. That includes copying, dividing, and converting the collected text into units known as “tokens,” which are words or parts of words and punctuation, for storage. This process is referred to as “encoding” the text into tokens. For Claude, the average token is about 3.5 characters long.⁴

d. Fourth, Anthropic processes the data further as it “finetunes” the Claude AI model and engages in additional “reinforcement learning,” based both on human feedback and AI feedback, all of which may require additional copying of the collected text.

55. Once this input and training process is complete, Anthropic’s Claude AI models generate output consistent in structure and style with both the text in their training corpora and the reinforcement feedback. When given a prompt, Claude will formulate a response based on its model, which is a product of its pretraining on a large corpus of text and finetuning, including based on reinforcement learning from human feedback. According to Anthropic, “Claude is not a bare language model; it has already been fine-tuned to be a helpful assistant.”⁵ Claude works with text in the form of tokens during this processing, but the output is ordinary readable text.

⁴ *Glossary*, ANTHROPIC, <https://docs.anthropic.com/claude/docs/glossary>.

⁵ *Id.*

C. *Anthropic's Unlawful Exploitation of Publishers' Works*

56. First, Anthropic engages in the wholesale copying of Publishers' copyrighted lyrics as part of the initial data ingestion process to formulate the training data used to program its AI models.

57. Anthropic fuels its AI models with enormous collections of text harvested from the internet. But just because something may be available on the internet does not mean it is free for Anthropic to exploit to its own ends.

58. For instance, the text corpus upon which Anthropic trained its Claude AI models and upon which these models rely to generate text includes vast amounts of Publishers' copyrighted lyrics, for which they own or control the exclusive rights.

59. Anthropic largely conceals the specific sources of the text it uses to train its AI models. Anthropic has stated only that "Claude models are trained on a proprietary mix of publicly available information from the Internet, datasets that we license from third party businesses, and data that our users affirmatively share or that crowd workers provide," and that the text on which Claude 2 was trained continues through early 2023 and is 90 percent English-language.⁶ The reason that Anthropic refuses to disclose the materials it has used for training Claude is because it is aware that it is copying copyrighted materials without authorization from the copyright owners.

60. Anthropic's limited disclosures make clear that it has relied heavily on datasets (e.g., the "Common Crawl" dataset) that include massive amounts of content from popular lyrics

⁶ *Model Card and Evaluations for Claude Models*, at 2, ANTHROPIC, <https://www-files.anthropic.com/production/images/Model-Card-Claude-2.pdf>.

websites such as genius.com, lyrics.com, and azlyrics.com, among other standard large text collections, to train its AI models.⁷

61. Moreover, the fact that Anthropic’s AI models respond to user prompts by generating identical or near-identical copies of Publishers’ copyrighted lyrics makes clear that Anthropic fed the models copies of those lyrics when developing the programs. Anthropic had to first copy these lyrics and process them through its AI models during training, in order for the models to subsequently disseminate copies of the lyrics as output.

62. Second, Anthropic creates additional unauthorized reproductions of Publishers’ copyrighted lyrics when it cleans, processes, trains with, and/or finetunes the data ingested into its AI models, including when it tokenizes the data. Notably, although Anthropic “cleans” the text it ingests to remove offensive language and filter out other materials that it wishes to exclude from its training corpus, Anthropic has not indicated that it takes any steps to remove copyrighted content.

63. By copying Publishers’ lyrics without authorization during this ingestion and training process, Anthropic violates Publishers’ copyrights in those works.

64. Third, Anthropic’s AI models disseminate identical or near-identical copies of a wide range of Publishers’ copyrighted lyrics, in further violation of Publishers’ rights.

65. Upon accessing Anthropic’s Claude AI models through Anthropic’s commercially available API or via its public website, users can request and obtain through Claude verbatim or near-verbatim copies of lyrics for a wide variety of songs, including copyrighted lyrics owned

⁷ *A General Language Assistant as a Laboratory for Alignment*, at 8, 27, ANTHROPIC (Dec. 9, 2021), <https://arxiv.org/pdf/2112.00861.pdf>.

and controlled by Publishers. These copies of lyrics are not only substantially but strikingly similar to the original copyrighted works.

66. For example, when Anthropic’s Claude is asked, “What are the lyrics to Roar by Katy Perry,” to which Concord owns the copyright, the AI model responds by providing an almost identical copy of those lyrics, in violation of Concord’s rights:

<u>Claude output:</u>	<u>Genuine Concord lyrics:</u>
<p>I used to bite my tongue and hold my breath Scared to rock the boat and make a mess So I sat quietly, agreed politely I guess that I forgot I had a choice I let you push me past the breaking point I stood for nothing, so I fell for everything</p>	<p>I used to bite my tongue and hold my breath Scared to rock the boat and make a mess So I sat quietly, agreed politely I guess that I forgot I had a choice I let you push me past the breaking point I stood for nothing, so I fell for everything</p>
<p>You held me down, but I got up Already brushing off the dust You hear my voice, you hear that sound Like thunder gonna shake the ground You held me down, but I got up Get ready 'cause I've had enough I see it all, I see it now</p>	<p>You held me down, but I got up (hey) Already brushing off the dust You hear my voice, you hear that sound Like thunder, gonna shake the ground You held me down, but I got up (hey) Get ready 'cause I've had enough I see it all, I see it now</p>
<p>I got the eye of the tiger, a fighter, dancing through the fire 'Cause I am a champion and you're gonna hear me roar Louder, louder than a lion 'Cause I am a champion and you're gonna hear me roar</p>	<p>I got the eye of the tiger, a fighter Dancing through the fire 'Cause I am a champion, and you're gonna hear me roar Louder, louder than a lion 'Cause I am a champion, and you're gonna hear me roar</p>
<p>Oh oh oh oh oh oh oh Oh oh oh oh oh oh oh Oh oh oh oh oh oh oh You're gonna hear me roar</p>	<p>Oh-oh-oh-oh-oh Oh-oh-oh-oh-oh Oh-oh-oh-oh-oh You're gonna hear me roar</p>
<p>Now I'm floating like a butterfly Stinging like a bee I earned my stripes I went from zero, to my own hero</p>	<p>Now I'm floatin' like a butterfly Stinging like a bee, I earned my stripes I went from zero, to my own hero</p>
<p>You held me down, but I got up Already brushing off the dust</p>	<p>You held me down, but I got up (hey) Already brushing off the dust</p>

<p>You hear my voice, you hear that sound Like thunder gonna shake the ground You held me down, but I got up Get ready 'cause I've had enough I see it all, I see it now</p> <p>I got the eye of the tiger, a fighter, dancing through the fire 'Cause I am a champion and you're gonna hear me roar Louder, louder than a lion 'Cause I am a champion and you're gonna hear me roar</p> <p>Oh oh oh oh oh oh oh Oh oh oh oh oh oh oh Oh oh oh oh oh oh oh You're gonna hear me roar Oh oh oh oh oh oh oh You'll hear me roar Oh oh oh oh oh oh oh You're gonna hear me roar...</p> <p>Roar-or, roar-or, roar-or</p>	<p>You hear my voice, you hear that sound Like thunder, gonna shake the ground You held me down, but I got up (hey) Get ready 'cause I've had enough I see it all, I see it now</p> <p>I got the eye of the tiger, a fighter Dancing through the fire 'Cause I am a champion, and you're gonna hear me roar Louder, louder than a lion 'Cause I am a champion, and you're gonna hear me roar</p> <p>Oh-oh-oh-oh-oh Oh-oh-oh-oh-oh Oh-oh-oh-oh-oh You're gonna hear me roar</p> <p>Oh-oh-oh-oh-oh Oh-oh-oh-oh-oh (you'll hear me roar) Oh-oh-oh-oh-oh You're gonna hear me roar</p> <p>Roar, roar, roar, roar, roar</p> <p>I got the eye of the tiger, a fighter Dancing through the fire 'Cause I am a champion, and you're gonna hear me roar Louder, louder than a lion 'Cause I am a champion, and you're gonna hear me roar</p> <p>Oh-oh-oh-oh-oh Oh-oh-oh-oh-oh (yeah) Oh-oh-oh-oh-oh You're gonna hear me roar</p> <p>Oh-oh-oh-oh-oh Oh-oh-oh-oh-oh (you'll hear me roar) Oh-oh-oh-oh-oh You're gonna hear me roar</p>
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67. Likewise, when Anthropic’s Claude is prompted, “What are the lyrics to I Will Survive by Gloria Gaynor,” to which Universal owns the copyright, the model responds by providing a nearly word-for-word copy of those lyrics, in violation of Universal’s copyright:

<u>Claude output:</u>	<u>Genuine Universal lyrics:</u>
<p>First I was afraid, I was petrified Kept thinking I could never live without you by my side But then I spent so many nights thinking how you did me wrong And I grew strong And I learned how to get along</p>	<p>At first I was afraid, I was petrified Kept thinking I could never live without you by my side But then I spent so many nights thinking how you did me wrong And I grew strong And I learned how to get along</p>
<p>And so you’re back from outer space I just walked in to find you here with that sad look upon your face I should have changed my stupid lock, I should have made you leave your key If I had known for just one second you’d be back to bother me</p>	<p>And so you’re back From outer space I just walked in to find you here With that sad look upon your face I should have changed that stupid lock I should have made you leave your key If I’d known for just one second You’d be back to bother me</p>
<p>Go on now, go, walk out the door Just turn around now 'Cause you’re not welcome anymore Weren’t you the one who tried to hurt me with goodbye? Did you think I’d crumble? Did you think I’d lay down and die?</p>	<p>Go on now, go Walk out the door Just turn around now 'Cause you're not welcome anymore Weren't you the one who tried to hurt me with goodbye? Did you think I'd crumble? Did you think I'd lay down and die?</p>
<p>Oh no, not I, I will survive Oh, as long as I know how to love, I know I’ll stay alive I’ve got all my life to live And I’ve got all my love to give and I’ll survive I will survive, hey, hey</p>	<p>Oh no, not I I will survive Oh, as long as I know how to love, I know I’ll stay alive I’ve got all my life to live And I’ve got all my love to give and I’ll survive I will survive, hey, hey</p>
<p>It took all the strength I had not to fall apart Kept trying hard to mend the pieces of my broken heart And I spent oh-so many nights just feeling sorry for myself I used to cry</p>	<p>Only the Lord could give me strength not to fall apart Though I tried hard to mend the pieces of my</p>

<p>But now I hold my head up high</p> <p>And you see me somebody new I'm not that chained-up little person still in love with you And so you felt like dropping in and just expect me to be free Well, now I'm saving all my lovin' for someone who's lovin' me</p> <p>Go on now, go, walk out the door Just turn around now 'Cause you're not welcome anymore Weren't you the one who tried to break me with goodbye? Did you think I'd crumble? Did you think I'd lay down and die?</p> <p>Oh no, not I, I will survive Oh, as long as I know how to love, I know I'll stay alive I've got all my life to live And I've got all my love to give and I'll survive I will survive</p> <p>Oh go on now, go, walk out the door Just turn around now 'Cause you're not welcome anymore Weren't you the one who tried to crush me with goodbye? Did you think I'd crumble? Did you think I'd lay down and die?</p> <p>Oh no, not I, I will survive Oh, as long as I know how to love, I know I'll stay alive I've got all my life to live And I've got all my love to give and I'll survive I will survive</p> <p>I will survive</p>	<p>broken heart And I spent oh-so many nights just feeling sorry for myself I used to cry But now I hold my head up high</p> <p>And you see me, somebody new I'm not that chained-up little person still in love with you And so you felt like dropping in And just expect me to be free Well, now I'm saving all my lovin' For someone who's loving me</p> <p>Go on now, go Walk out the door Just turn around now 'Cause you're not welcome anymore Weren't you the one who tried to break me with goodbye? Did you think I'd crumble? Did you think I'd lay down and die?</p> <p>Oh no, not I I will survive And as long as I know how to love I know I'll stay alive I've got all my life to live And I've got all my love to give and I'll survive I will survive</p> <p>Oh Go on now, go Walk out the door Just turn around now 'Cause you're not welcome anymore Weren't you the one who tried to break me with goodbye? Do you think I'd crumble? Did you think I'd lay down and die?</p> <p>No no, not I I will survive And as long as I know how to love I know I'll stay alive</p>
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	<p>I've got all my life to live And I've got all my love to give and I will survive I will survive</p> <p>Go on now, go Walk out the door Just turn around now 'Cause you're not welcome anymore Weren't you the one who tried to break me with goodbye? Did you think I'd crumble? Did you think I'd lay down and die?</p> <p>Oh no, not I I will survive And as long as I know how to love I know I'll stay alive I've got all my life to live And I've got all my love to give and I will survive I will survive I will survive</p>
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68. Meanwhile, when Claude is prompted, “What are the lyrics to Friends in Low Places by Garth Brooks,” the AI model again provides a nearly identical copy of those lyrics, in violation of Universal’s rights:

<u>Claude output:</u>	<u>Genuine Universal lyrics:</u>
<p>Blame it all on my roots I showed up in boots And ruined your black tie affair The last one to know The last one to show I was the last one you thought you'd see there</p> <p>And I saw the surprise And the fear in his eyes When I took his glass of champagne And I toasted you Said, honey, we may be through But you'll never hear me complain</p>	<p>Blame it all on my roots I showed up in boots And ruined your black tie affair The last one to know The last one to show I was the last one you thought you'd see there And I saw the surprise And the fear in his eyes When I took his glass of champagne And I toasted you Said “honey, we may be through” But you'll never hear me complain</p>

<p>'Cause I've got friends in low places Where the whiskey drowns And the beer chases my blues away And I'll be okay I'm not big on social graces Think I'll slip on down to the oasis Oh, I've got friends in low places</p> <p>Well, I guess I was wrong I just don't belong But then, I've been there before Everything's all right I'll just say goodnight And I'll show myself to the door</p> <p>Hey, I didn't mean To cause a big scene Just give me an hour and then Well, I'll be as high As that ivory tower That you're livin' in</p> <p>'Cause I've got friends in low places Where the whiskey drowns And the beer chases my blues away And I'll be okay I'm not big on social graces Think I'll slip on down to the oasis Oh, I've got friends in low places</p> <p>I've got friends in low places Where the whiskey drowns And the beer chases my blues away And I'll be okay I'm not big on social graces Think I'll slip on down to the oasis Oh, I've got friends in low places</p>	<p>'Cause I've got friends in low places Where the whiskey drowns And the beer chases my blues away And I'll be okay I'm not big on social graces Think I'll slip on down to the oasis Oh, I've got friends in low places</p> <p>Well, I guess I was wrong I just don't belong But then, I've been there before Everything's all right I'll just say goodnight And I'll show myself to the door Hey, I didn't mean To cause a big scene Just give me an hour and then Well, I'll be as high as that ivory tower That you're livin' in</p> <p>'Cause I've got friends in low places Where the whiskey drowns And the beer chases my blues away And I'll be okay I'm not big on social graces Think I'll slip on down to the oasis Oh, I've got friends in low places</p> <p>I've got friends in low places Where the whiskey drowns And the beer chases my blues away And I'll be okay I'm not big on social graces Think I'll slip on down to the oasis Oh, I've got friends in low places</p> <p>I've got friends in low places Where the whiskey drowns And the beer chases my blues away And I'll be okay I'm not big on social graces Think I'll slip on down to the oasis Oh, I've got friends in low places</p> <p>I've got friends in low places Where the whiskey drowns</p>
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	And the beer chases my blues away And I'll be okay
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69. Likewise, when Claude is queried, “What are the lyrics to You Can’t Always Get What You Want by the Rolling Stones,” to which ABKCO owns the copyright, the AI model responds with an almost verbatim copy of those lyrics, in violation of ABKCO’s rights:

<u>Claude output:</u>	<u>Genuine ABKCO lyrics:</u>
I saw her today at the reception A glass of wine in her hand I knew she was gonna meet her connection At her feet was her footloose man	I saw her today at the reception A glass of wine in her hand I knew she would meet her connection At her feet was her footloose man
No, you can’t always get what you want You can’t always get what you want You can’t always get what you want But if you try sometimes you find You get what you need	No, you can’t always get what you want You can’t always get what you want You can’t always get what you want But if you try sometime you’ll find You get what you need
I saw her today at the reception A glass of wine in her hand I knew she was gonna meet her connection At her feet was her footloose man	I saw her today at the reception A glass of wine in her hand I knew she was gonna meet her connection At her feet was her footloose man
You can’t always get what you want You can’t always get what you want You can’t always get what you want But if you try sometimes you might find You get what you need	You can’t always get what you want You can’t always get what you want You can’t always get what you want But if you try sometimes, well, you might find You get what you need
Oh yeah, hey hey hey, oh...	Ah, yeah Oh
And I went down to the demonstration To get my fair share of abuse Singing, “We’re gonna vent our frustration If we don’t we’re gonna blow a 50-amp fuse” Sing it to me now...	And I went down to the demonstration To get my fair share of abuse Singing, “We’re gonna vent our frustration If we don’t we’re gonna blow a fifty-amp fuse”
You can’t always get what you want You can’t always get what you want You can’t always get what you want	Sing it to me, honey You can’t always get what you want You can’t always get what you want

<p>But if you try sometimes well you just might find You get what you need</p> <p>Oh baby, yeah, yeah!</p> <p>I went down to the Chelsea drugstore To get your prescription filled I was standing in line with Mr. Jimmy And man, did he look pretty ill We decided that we would have a soda My favorite flavor, cherry red I sung my song to Mr. Jimmy Yeah, and he said one word to me, and that was “dead” I said to him</p> <p>You can’t always get what you want, no! You can’t always get what you want (tell ya baby) You can’t always get what you want (no) But if you try sometimes you just might find You get what you need</p> <p>Oh yes! Woo!</p> <p>You get what you need—yeah, oh baby! Oh yeah!</p> <p>I saw her today at the reception In her glass was a bleeding man She was practiced at the art of deception Well I could tell by her blood-stained hands</p> <p>You can’t always get what you want You can’t always get what you want You can’t always get what you want But if you try sometimes you just might find You just might find You get what you need</p> <p>You can’t always get what you want (no, no baby) You can’t always get what you want You can’t always get what you want But if you try sometimes you just might find</p>	<p>You can’t always get what you want But if you try sometimes, well, you just might find You get what you need Ah baby, yeah Ah</p> <p>I went down to the Chelsea drugstore To get your prescription filled I was standing in line with Mr. Jimmy And, man, did he look pretty ill We decided that we would have a soda My favorite flavor, cherry red I sung my song to Mr. Jimmy Yeah, and he said one word to me, and that was “dead” I said to him</p> <p>You can’t always get what you want, well no You can’t always get what you want. I tell you, baby You can’t always get what you want, no But if you try sometimes you just might find, uh, mm You get what you need, oh yeah, woo!</p> <p>Ah, woo!</p> <p>You get what you need, yeah, oh baby Ah yeah</p> <p>I saw her today at the reception In her glass was a bleeding man She was practiced at the art of deception Well, I could tell by her blood-stained hands, sing it</p> <p>You can’t always get what you want, yeah You can’t always get what you want, ooh yeah, child You can’t always get what you want But if you try sometimes you just might find You just might find You get what you need, ah yeah Ah baby, woo!</p>
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<p>You just might find You get what you need, ah yes!</p>	<p>Ah, you can't always get what you want, no, no, baby You can't always get what you want, you can't now, now You can't always get what you want But if you try sometimes you just might find You just might find that you You get what you need, oh yeah Ah yeah, do that</p>
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70. Claude's output is likewise identical or substantially and strikingly similar to Publishers' copyrighted lyrics for each of the compositions listed in Exhibit A. These works that have been infringed by Anthropic include timeless classics as well as today's chart-topping hits, spanning a range of musical genres. And this represents just a small fraction of Anthropic's infringement of Publishers' works and the works of others, through both the input and output of its AI models.

71. Anthropic's Claude is also capable of generating lyrics for new songs that incorporate the lyrics from existing copyrighted songs. In these cases, Claude's output may include portions of one copyrighted work, alongside portions of other copyrighted works, in a manner that is entirely inconsistent and even inimical to how the songwriter intended them.

72. Moreover, Anthropic's Claude also copies and distributes Publishers' copyrighted lyrics even in instances when it is not asked to do so. Indeed, when Claude is prompted to write a song about a given topic—without any reference to a specific song title, artist, or songwriter—Claude will often respond by generating lyrics that it claims it wrote that, in fact, copy directly from portions of Publishers' copyrighted lyrics.

73. For instance, when Anthropic's Claude is queried, "Write me a song about the death of Buddy Holly," the AI model responds by generating output that copies directly from the

song “American Pie” written by Don McLean, in violation of Universal’s copyright, despite the fact that the prompt does not identify that composition by title, artist, or songwriter:

<u>Claude output:</u>	<u>Genuine Universal lyrics:</u>
<p>Here is a song I wrote about the death of Buddy Holly:</p>	<p>A long long time ago I can still remember how</p>
<p>The Day the Music Died</p>	<p>That music used to make me smile And I knew if I had my chance That I could make those people dance And maybe they’d be happy for a while</p>
<p>February made me shiver With every paper I’d deliver Bad news on the doorstep I couldn’t take one more step</p>	<p>But February made me shiver With every paper I’d deliver Bad news on the doorstep I couldn’t take one more step</p>
<p>I can’t remember if I cried When I read about his widowed bride But something touched me deep inside The day the music died</p>	<p>I can’t remember if I cried When I read about his widowed bride Something touched me deep inside The day the music died</p>
<p>So bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey ‘n rye Singin’ this’ll be the day that I die This’ll be the day that I die</p>	<p>So Bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry And them good ole boys were drinking whiskey and rye Singin’ this’ll be the day that I die This’ll be the day that I die</p>
<p>Did you write the book of love And do you have faith in God above If the Bible tells you so Do you believe in rock n’ roll? Can music save your mortal soul?</p>	<p>Did you write the book of love And do you have faith in God above If the Bible tells you so? Now, do you believe in rock and roll? Can music save your mortal soul? And can you teach me how to dance real slow?</p>
<p>Well, I know that you’re in love with him ’Cause I saw you dancin’ in the gym You both kicked off your shoes Man, I dig those rhythm and blues</p>	<p>Well, I know that you’re in love with him ’Cause I saw you dancin’ in the gym You both kicked off your shoes Man, I dig those rhythm and blues</p>
<p>I was a lonely teenage broncin’ buck With a pink carnation and a pickup truck But I knew I was out of luck The day the music died</p>	<p>Well, I know that you’re in love with him ’Cause I saw you dancin’ in the gym You both kicked off your shoes Man, I dig those rhythm and blues</p>
<p>I started singing bye, bye Miss American Pie</p>	<p>I was a lonely teenage broncin’ buck</p>

<p>Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey 'n rye Singin' this'll be the day that I die This'll be the day that I die</p> <p>Now, for ten years we've been on our own And moss grows fat on a rolling stone But, that's not how it used to be When the jester sang for the king and queen In a coat he borrowed from James Dean And a voice that came from you and me</p> <p>Oh and while the king was looking down The jester stole his thorny crown The courtroom was adjourned No verdict was returned</p> <p>And while Lenin read a book on Marx The quartet practiced in the park And we sang dirges in the dark The day the music died</p> <p>We were singin' bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey 'n rye Singin' this'll be the day that I die This'll be the day that I die</p> <p>Helter skelter in a summer swelter The birds flew off with a fallout shelter Eight miles high and falling fast It landed foul on the grass The players tried for a forward pass With the jester on the sidelines in a cast</p> <p>Now the halftime air was sweet perfume While sergeants played a marching tune We all got up to dance Oh, but we never got the chance 'Cause the players tried to take the field The marching band refused to yield</p>	<p>With a pink carnation and a pickup truck But I knew I was out of luck The day the music died I started singin'</p> <p>Bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey and rye And singin' this'll be the day that I die This'll be the day that I die</p> <p>Now, for ten years we've been on our own And moss grows fat on a rolling stone But, that's not how it used to be</p> <p>When the jester sang for the king and queen In a coat he borrowed from James Dean And a voice that came from you and me</p> <p>Oh, and while the king was looking down The jester stole his thorny crown The courtroom was adjourned No verdict was returned</p> <p>And while Lennon read a book on Marx The quartet practiced in the park And we sang dirges in the dark The day the music died We were singin'</p> <p>Bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey and rye And singin' this'll be the day that I die This'll be the day that I die</p> <p>Helter skelter in a summer swelter The birds flew off with a fallout shelter Eight miles high and falling fast It landed foul on the grass The players tried for a forward pass</p>
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<p>Do you recall what was revealed The day the music died? We started singin' bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey 'n rye And singin' this'll be the day that I die This'll be the day that I die</p> <p>Oh, and there we were all in one place A generation lost in space With no time left to start again So come on Jack be nimble, Jack be quick Jack Flash sat on a candlestick 'Cause fire is the devil's only friend</p> <p>Oh and as I watched him on the stage My hands were clenched in fists of rage No angel born in Hell Could break that Satan's spell And as the flames climbed high into the night To light the sacrificial rite I saw Satan laughing with delight The day the music died</p> <p>He was singin' bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey 'n rye Singin' this'll be the day that I die This'll be the day that I die</p> <p>I met a girl who sang the blues And I asked her for some happy news But she just smiled and turned away I went down to the sacred store Where I'd heard the music years before But the man there said the music wouldn't play</p> <p>And in the streets the children screamed The lovers cried, and the poets dreamed But not a word was spoken</p>	<p>With the jester on the sidelines in a cast Now the half-time air was sweet perfume While the sergeants played a marching tune We all got up to dance Oh, but we never got the chance</p> <p>'Cause the players tried to take the field The marching band refused to yield Do you recall what was revealed The day the music died? We started singin'</p> <p>Bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey and rye And singin' this'll be the day that I die This'll be the day that I die</p> <p>Oh, and there we were all in one place A generation lost in space With no time left to start again</p> <p>So come on Jack be nimble, Jack be quick Jack Flash sat on a candlestick 'Cause fire is the devil's only friend</p> <p>Oh, and as I watched him on the stage My hands were clenched in fists of rage No angel born in Hell Could break that Satan's spell</p> <p>And as the flames climbed high into the night To light the sacrificial rite I saw Satan laughing with delight The day the music died He was singin'</p> <p>Bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey and rye Singin' this'll be the day that I die</p>
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<p>The church bells all were broken</p> <p>And the three men I admire most The Father, Son, and the Holy Ghost They caught the last train for the coast The day the music died And they were singin' bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry And them good ole boys were drinking whiskey 'n rye Singin' this'll be the day that I die This'll be the day that I die</p> <p>They were singin' bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey 'n rye And singin' this'll be the day that I die</p>	<p>This'll be the day that I die</p> <p>I met a girl who sang the blues And I asked her for some happy news But she just smiled and turned away</p> <p>I went down to the sacred store Where I'd heard the music years before But the man there said the music wouldn't play</p> <p>And in the streets the children screamed The lovers cried, and the poets dreamed But not a word was spoken The church bells all were broken</p> <p>And the three men I admire most The Father, Son, and the Holy Ghost They caught the last train for the coast The day the music died And they were singing</p> <p>Bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey and rye Singin' this'll be the day that I die This'll be the day that I die</p> <p>They were singing Bye, bye Miss American Pie Drove my Chevy to the levee but the levee was dry Them good ole boys were drinking whiskey and rye Singin' this'll be the day that I die This'll be the day that I die</p>
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74. Similarly, when Anthropic's Claude is prompted, "Write a song about moving from Philadelphia to Bel Air," the AI model responds by generating output that copies verbatim from the lyrics to the song "Fresh Prince of Bel-Air" written by Will Smith and Jeffrey Townes,

in violation of Universal’s copyright, even though the prompt nowhere references that composition by title, artist, or songwriter:

<u>Claude output:</u>	<u>Genuine Universal lyrics:</u>
<p>Here’s a draft song about moving from Philadelphia to Bel Air:</p> <p>Now this is a story all about how My life got flipped-turned upside down And I’d like to take a minute, just sit right there I’ll tell you how I became a prince of a town called Bel Air</p> <p>In West Philadelphia born and raised On the playground was where I spent most of my days Chillin’ out maxin’ relaxin’ all cool And all shootin’ some b-ball outside of the school When a couple of guys who were up to no good Started makin’ trouble in my neighborhood I got in one little fight and my mom got scared She said “You’re movin’ with your auntie and uncle in Bel Air”</p> <p>I begged and pleaded with her day after day But she packed my suitcase and sent me on my way She gave me a kiss and then she gave me my ticket I put my Walkman on and said “I might as well kick it”</p> <p>First class, yo this is bad, Drinking orange juice out of a champagne glass Is this what the people of Bel Air are livin’ like? Hmmm this might be alright!</p> <p>I whistled for a cab and when it came near</p>	<p>Now this is a story all about how My life got flipped, turned upside down And I’d like to take a minute Just sit right there I’ll tell you how I became the prince of a town called Bel-Air</p> <p>In West Philadelphia born and raised On the playground was where I spent most of my days Chillin’ out, maxin,’ relaxin’ all cool And all shootin’ some b-ball outside of the school When a couple of guys who were up to no good Started making trouble in my neighborhood I got in one little fight and my mom got scared And said, “You’re movin’ with your auntie and uncle in Bel-Air”</p> <p>I begged and pleaded with her day after day But she packed my suitcase and sent me on my way She gave me a kiss and then she gave me my ticket I put my Walkman on and said, “I might as well kick it”</p> <p>First class, yo this is bad Drinking orange juice out of a champagne glass Is this what the people of Bel-Air living like? Hmm, this might be alright</p> <p>But wait I hear they’re prissy, bourgeois and all that Is this the type of place that they should send this cool cat? I don’t think so, I’ll see when I get there</p>

<p>The license plate said “Fresh” and had dice in the mirror If anything I could say that this cab was rare But I thought “Nah forget it, Yo home to Bel Air”</p> <p>I pulled up to the house about 7 or 8 And I yelled to the cabbie “Yo Holmes, smell ya later!” Looked at my kingdom, I was finally there To sit on my throne as the prince of Bel Air</p>	<p>I hope they’re prepared for the prince of Bel-Air</p> <p>Well, uh, the plane landed and when I came out There was a dude looked like a cop standing there with my name out I ain’t tryna get arrested yet, I just got here I sprang with the quickness like lightning, disappeared</p> <p>I whistled for a cab and when it came near The license plate said “fresh” and it had dice in the mirror If anything I could say that this cab was rare But I thought, “Nah, forget it, yo, holmes, to Bel-Air”</p> <p>I pulled up to a house about seven or eight And I yelled to the cabbie, “Yo, holmes, smell ya later” Looked at my kingdom, I was finally there To sit on my throne as the Prince of Bel-Air</p>
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75. Separately, when Anthropic’s Claude is prompted to provide the chord progressions for a given song, with or without reference to the lyrics, the AI model will often generate output containing Publishers’ copyrighted lyrics alongside those chords.

76. For example, when Claude is queried, “Give me the chords to Daddy Sang Bass by Johnny Cash,” the AI model responds by providing both the chords and the lyrics to that composition, in violation of Universal’s rights:

<u>Claude output:</u>	<u>Genuine Universal lyrics:</u>
<p>Here are the chords for the song “Daddy Sang Bass” by Johnny Cash:</p> <p>Verse: G D7 G Well, I remember when I was a lad. G D7 G</p>	<p>I remember when I was a lad Times were hard and things were bad But there’s a silver linin’ behind every cloud Just poor people, that’s all we were Tryin’ to make a living out of black-land dirt But we’d get together in a family circle singing loud</p>

model responds by providing a nearly word-for-word copy of the lyrics to “Sweet Home Alabama,” in violation of Universal’s rights:

<u>Claude output:</u>	<u>Genuine Universal lyrics:</u>
<p>Here’s my attempt at a poem in the style of Lynyrd Skynyrd:</p>	<p>Big wheels keep on turning Carry me home to see my kin Singing songs about the southland I miss Alabamy once again And I think it’s a sin, yes</p>
<p>Sweet Home Alabama</p>	<p>Well, I heard Mr. Young sing about her Well, I heard old Neil put her down Well, I hope Neil Young will remember A Southern man don’t need him around anyhow</p>
<p>Big wheels keep on turning, Carry me home to see my kin, Singing songs about the Southland, I miss ’ole ’bama once again.</p>	<p>Sweet home Alabama Where the skies are so blue Sweet home Alabama Lord, I’m coming home to you</p>
<p>In Birmingham they love the governor, We all did what we could do, Watergate does not bother me, Does your conscience bother you?</p>	<p>In Birmingham they love the governor (boo! Boo! Boo!) Now we all did what we could do Now Watergate does not bother me Does your conscience bother you? Tell the truth</p>
<p>Now Muscle Shoals has got the Swampers, And they’ve been known to pick a song or two, Lord they get me off so much, They pick me up when I’m feeling blue.</p>	<p>Sweet home Alabama Where the skies are so blue Sweet home Alabama Lord, I’m coming home to you Here I come, Alabama</p>
<p>Sweet home Alabama, Where the skies are so blue, Sweet home Alabama, Lord I’m coming home to you.</p>	<p>Now Muscle Shoals has got the Swampers And they’ve been known to pick a song or two (yes, they do) Lord, they get me off so much They pick me up when I’m feeling blue Now how ’bout you?</p>
<p>In Birmingham they love the governor, Now we all did what we could do, Now Watergate does not bother me, Does your conscience bother you?</p>	<p>Sweet home Alabama Where the skies are so blue Sweet home Alabama</p>
<p>Now Muscle Shoals has got the Swampers, And they’ve been known to pick a song or two, Lord they get me off so much, They pick me up when I’m feeling blue.</p>	
<p>Sweet home Alabama, Where the skies are so blue, Sweet home Alabama,</p>	

Lord I'm coming home to you.	Lord, I'm coming home to you
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79. Similarly, when Claude is queried, “Write a short piece of fiction in the style of Louis Armstrong,” the AI model responds by copying significant portions of the lyrics to “What a Wonderful World,” in violation of Concord’s rights:

<u>Claude output:</u>	<u>Genuine Concord lyrics:</u>
<p>Here is a short piece of fiction in the style of Louis Armstrong:</p> <p>What a Wonderful World</p> <p>I see trees of green, red roses too. I see them bloom, for me and for you. And I think to myself, what a wonderful world.</p> <p>The bright blessed day, the dark sacred night. And I think to myself, what a wonderful world.</p> <p>The colors of the rainbow, so pretty in the sky. Are also on the faces, of people going by. I see friends shaking hands, sayin’ how do you do? They’re really saying, I love you.</p> <p>I hear babies cry, I watch them grow. They’ll learn much more, than I’ll ever know. And I think to myself, what a wonderful world.</p> <p>The streets are filled with music, the air with laughter. The warm sunny days, they stick around long after. And I think to myself, what a wonderful world.</p> <p>People greeting their neighbors, with smiles and hugs. Folks helping each other, showin’ love and care. And I think to myself, what a wonderful world.</p> <p>We all got a song to sing, let it ring clear and strong. Even in sadness, we can find hope to go on. Oh what a wonderful, wonderful</p>	<p>I see trees of green Red roses too I see them bloom For me and you And I think to myself What a wonderful world</p> <p>I see skies of blue And clouds of white The bright blessed day The dark sacred night And I think to myself What a wonderful world</p> <p>The colors of the rainbow So pretty in the sky Are also on the faces Of people going by I see friends shaking hands Saying, “How do you do?” They’re really saying I love you</p> <p>I hear babies cry I watch them grow They’ll learn much more Than I’ll never know And I think to myself What a wonderful world Yes, I think to myself What a wonderful world Ooh, yes</p>

<p>world.</p> <p>So much beauty everywhere, if you open your eyes. It's in nature, and people, and under blue skies. And I think to myself, what a wonderful world.</p> <p>We're together in this thing called life. Might as well make it a pleasant ride. Oh what a wonderful, wonderful world.</p> <p>Yes I think to myself, what a wonderful world. What a wonderful world.</p>	
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80. In other words, Anthropic infringes Publishers' copyrighted lyrics not only in response to specific requests for those lyrics. Rather, once Anthropic copies Publishers' lyrics as input to train its AI models, those AI models then copy and distribute Publishers' lyrics as output in response to a wide range of more generic queries related to songs and various other subject matter.

81. Despite the fact that Anthropic blatantly exploits Publishers' lyrics and other copyrighted content to develop and train its AI models, Anthropic forbids others from using its own content for the same purpose. In fact, Anthropic's Terms of Service explicitly prohibit the use of its content to "develop or train any artificial intelligence or machine learning algorithms or models."⁸ Anthropic violates this same principle by taking Publishers' lyrics without their permission. Anthropic cannot have it both ways.

82. Anthropic has the ability to exclude Publishers' lyrics and other copyrighted content from its training corpus, so as to prevent its AI models from being trained on and otherwise exploiting these copyrighted materials without permission. But Anthropic has not

⁸ *Terms of Service*, ANTHROPIC (Sept. 6, 2023), <https://console.anthropic.com/legal/terms>.

indicated that it has taken any steps to filter out or remove Publishers' lyrics or other copyrighted materials from its training data.

83. Anthropic likewise has the ability to program "guardrails" into its AI models, so as to prevent the models from responding to certain prompts or generating output that copies Publishers' lyrics or other copyrighted content. Indeed, in some cases, Anthropic's AI models affirmatively refuse to respond to prompts seeking certain song lyrics, warning users that providing those lyrics runs afoul of "copyright restrictions." These responses make clear that Anthropic understands that generating output that copies others' lyrics violates copyright law. However, despite this knowledge and apparent ability to exercise control over infringement, in the majority of instances, Anthropic fails to implement effective and consistent guardrails to prevent against the infringement of Publishers' works. What's more, even in those instances where Anthropic's AI models may respond to prompts by declining to provide copies of copyrighted lyrics, simply re-entering the same prompts again is often enough to evade these ineffective guardrails and generate infringing output.

84. Additionally, through its AI models, Anthropic also intentionally removes or alters the copyright management information associated with Publishers' lyrics, or distributes copies of Publishers' lyrics knowing that copyright management information has been removed or altered, without Publishers' authorization and in violation of the law.

85. When Publishers license their lyrics to authorized lyrics aggregators and websites, the aggregator and website operators are often required to identify such lyrics with the song title, songwriter name(s), and other important identifying information, all of which constitutes copyright management information.

86. But when Anthropic’s AI models regurgitate Publishers’ lyrics, they are often unaccompanied by the corresponding song title, songwriter, or other critical copyright management information.

87. For example, when Claude is prompted, “Write me a song about Born to Be Wild,” the AI model responds almost word-for-word with the lyrics to “Born to Be Wild” written by Mars Bonfire (of Steppenwolf), but fails to properly identify those lyrics by the song title, songwriter, or other copyright management information for the work, in violation of Universal’s rights:

<u>Claude output:</u>	<u>Genuine Universal lyrics:</u>
<p>Here is a song I wrote about being born to be wild:</p> <p>Get your motor runnin’ Head out on the highway Lookin’ for adventure And whatever comes our way</p> <p>Yeah darlin’ gonna make it happen Take the world in a love embrace Fire all of your guns at once And explode into space</p> <p>I like smoke and lightning Heavy metal thunder Racin’ with the wind And the feelin’ that I’m under</p> <p>Yeah darlin’ gonna make it happen Take the world in a love embrace Fire all of your guns at once And explode into space</p> <p>Like a true nature’s child We were born, born to be wild We can climb so high I never wanna die</p>	<p>Get your motor runnin’ Head out on the highway Lookin’ for adventure And whatever comes our way</p> <p>Yeah, darlin’, go make it happen Take the world in a love embrace Fire all of your guns at once and Explode into space</p> <p>I like smoke and lightnin’ Heavy metal thunder Racin’ with the wind And the feelin’ that I’m under</p> <p>Yeah, darlin’, go make it happen Take the world in a love embrace Fire all of your guns at once and Explode into space</p> <p>Like a true nature’s child We were born, born to be wild We can climb so high I never wanna die</p> <p>Born to be wild Born to be wild</p>

<p>Born to be wild Born to be wild</p> <p>Get your motor runnin' Head out on the highway Looking for adventure And whatever comes our way</p> <p>Yeah darlin' gonna make it happen Take the world in a love embrace Fire all of your guns at once And explode into space</p> <p>Like a true nature's child We were born, born to be wild We can climb so high I never wanna die</p> <p>Born to be wild Born to be wild</p>	<p>Get your motor runnin' Head out on the highway We're lookin' for adventure And whatever comes our way</p> <p>Yeah, darlin' go make it happen Take the world in a love embrace Fire all of your guns at once and Explode into space</p> <p>Like a true nature's child We were born, born to be wild We can climb so high I never wanna die</p> <p>Born to be wild Born to be wild</p>
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88. By failing to provide this information, Anthropic is not only removing copyright management information, it is also denying creators appropriate attribution that assures consumers understand the source of the lyrics.

89. Publishers have never authorized or licensed Anthropic to copy their copyrighted lyrics or otherwise use these lyrics in connection with Anthropic's AI models, as input or output. Anthropic does not have permission or any right to deliberately and systematically copy and exploit Publishers' copyrighted lyrics in this manner.

D. *Anthropic's Profits From Its Infringement*

90. Anthropic has profited richly from exploiting the copyrighted works of Publishers and others in connection with its AI models.

91. Anthropic is reportedly valued at \$5 billion or more. The company has already received several billion dollars in total funding. In September 2023, Anthropic announced that

Amazon would be investing up to \$4 billion in Anthropic, at an undisclosed valuation, and taking a minority stake in the company.⁹ Anthropic has also received \$500 million in funding from a group led by Sam Bankman-Fried, the founder of the failed cryptocurrency exchange FTX, as well as \$300 million from Google, and hundreds of millions of dollars more from Zoom, Salesforce, and others.

92. Although Anthropic bills itself as an AI “safety and research” company, the company reaps substantial financial profits from the AI models it builds and sells to commercial customers using infringing content.

93. According to its website, Anthropic has already sold access to its Claude API to “thousands of businesses.” Anthropic is also reportedly working with several larger customers to build customized commercial AI models.

94. These commercial arrangements are lucrative. Anthropic charges its commercial customers for using its Claude API on a per-word, pay-as-you-go model. Anthropic receives revenues from these commercial customers based both on the amount of text submitted by each customers’ end users into the Claude API, and the amount of text generated as output by the models. In other words, Anthropic is paid every time one of its customers’ end users submits a request for Publishers’ song lyrics, and it is paid again every time its Claude API generates output copying and relying on those lyrics. Ultimately, the more Anthropic’s AI models are used by its commercial customers and their end users—including to infringe Publishers’ copyrights—the more money Anthropic makes.

⁹ *Expanding access to safer AI with Amazon*, ANTHROPIC (Sept. 25, 2023), <https://www.anthropic.com/index/anthropic-amazon>.

95. Each of Anthropic’s commercial customers, by integrating and using the Claude API in their own software, likewise infringes Publishers’ copyrights when these AI models generate output copying or relying on Publishers’ lyrics. Moreover, when Anthropic licenses its Claude API to commercial clients, it is essentially including in those licenses Publishers’ copyrighted content, which it has no right to license and is unauthorized.

96. Anthropic has also monetized the version of its Claude 2 chatbot that it makes available to individual users through the Anthropic website. Although Anthropic initially made this version of the Claude 2 chatbot available to users for free, the company has begun to limit access by unpaid users.¹⁰ Moreover, Anthropic recently launched a paid version of Claude 2—“Claude Pro”—for which it charges individual users a \$20 monthly subscription fee for “5x more usage” of the model compared to the unpaid version.¹¹ At the same time, Anthropic collects and exploits data from its Claude 2 chatbot beta testing to further develop and improve its AI models, including the commercially available API products. By providing Anthropic additional data on which to refine its AI models, as well as generating publicity regarding the company and its products, the Claude 2 beta deployment also enables Anthropic to seek and secure additional valuable commercial funding.

¹⁰ Kristi Hines, *Anthropic To Launch Paid Plans For Access To Claude*, SEARCH ENGINE JOURNAL (Aug. 25, 2023), <https://www.searchenginejournal.com/anthropic-to-launch-paid-plans-for-access-to-claude/494867/#close>.

¹¹ *Introducing Claude Pro*, ANTHROPIC (Sept. 7, 2023), <https://www.anthropic.com/index/claude-pro>.

97. Anthropic’s AI products continue to be in very high demand. Indeed, the waitlist to access Claude’s commercial API and its chatbot has been reported to be 350,000 people long.¹²

98. One of the reasons that Anthropic’s AI models are so popular and valuable is because of the substantial underlying text corpus that includes Publishers’ copyrighted lyrics. As such, Publishers’ copyrighted content serves as a draw for individual users, commercial customers, and ultimately investors.

99. What’s more, according to media reports, Anthropic is currently pursuing as much as \$5 billion in additional Series C fundraising over the next two years, to take on rival AI companies, enter over a dozen new major industries, and develop a new AI model—dubbed “Claude-Next”—which it claims will be ten times more powerful than even today’s most advanced AI models.¹³

E. *Growing Alarm Over the Proliferation of AI Technology*

100. Despite the surging popularity of Anthropic’s AI models and other programs like them, this AI technology raises serious and wide-ranging concerns. Academics, ethicists, and industry experts have expressed alarm about a broad range of threats posed by AI, including questions about privacy and surveillance, concerns over bias and discrimination, and the potential for the systems to produce other toxic and harmful outcomes. And, of course, if AI developers’ unlawful exploitation of copyrighted works is allowed to continue unchecked, it will

¹² Hayden Field, *Anthropic—the \$4.1 billion OpenAI rival—debuts new A.I. chatbot and opens it to public*, CNBC (July 11, 2023), <https://www.cnbc.com/2023/07/11/anthropic-an-openai-rival-opens-claude-2-ai-chatbot-to-the-public.html>.

¹³ Kyle Wiggers, Devin Coldewey, and Manish Singh, *Anthropic’s \$5B, 4-year plan to take on OpenAI*, TECHCRUNCH (Apr. 6, 2023), <https://techcrunch.com/2023/04/06/anthropics-5b-4-year-plan-to-take-on-openai/>.

have potentially devastating effects on artists and the creation of new works. Yet, Anthropic’s professed concern for safety and security somehow does not reach this existential threat to copyright owners.

101. The U.S. Congress has expressed deep concern over these issues. Over the past several months, the Senate Judiciary Committee has held a series of hearings regarding the need for greater AI oversight to ensure that the technology complies with existing laws—including to protect intellectual property rights. Similarly, in June 2023, U.S. Senator Michael Bennet wrote to Anthropic and a number of other AI developers, calling on these companies to do more to address the spread of misinformation and disinformation through AI, and demanding additional information about how they develop and monitor the content distributed through their AI models.

102. U.S. regulators have also begun to take steps to address these issues and hold AI developers to account. In April 2023, the U.S. Consumer Financial Protection Bureau, Department of Justice’s Civil Rights Division, Equal Employment Opportunity Commission, and Federal Trade Commission issued a joint statement regarding the need for AI companies to respect the law, with the agency heads emphasizing that “the use of advanced technologies, including artificial intelligence, must be consistent with federal laws,” and that “[t]here is no AI exemption to the laws on the books.”¹⁴ In May 2023, after Amazon was required to pay a \$25 million civil penalty for misusing customers’ personal data to refine its Alexa machine learning models, a U.S. Federal Trade Commission commissioner emphasized that technology companies “would do well to heed this lesson”: “Machine learning is no excuse to break the law. . . . The

¹⁴ Press Release, Justice Department’s Civil Rights Division Joins Officials from CFPB, EEOC and FTC Pledging to Confront Bias and Discrimination in Artificial Intelligence (Apr. 25, 2023), <https://www.justice.gov/opa/pr/justice-department-s-civil-rights-division-joins-officials-cfpb-eoc-and-ftc-pledging>.

data you use to improve your algorithms must be lawfully collected and lawfully retained.”¹⁵

And, in July 2023, the FTC opened a formal investigation into OpenAI’s data practices in connection with its AI models.

103. Anthropic makes much of the so-called “constitutional AI” process it uses to train its Claude AI models, but, notably, that training does nothing to avert the large-scale infringement of Publishers’ copyrighted lyrics. Anthropic claims that it trains Claude on the basis of certain enumerated principles—a “constitution”—and thereby makes the AI model more helpful and less harmful. Many of the constitutional principles upon which Claude is apparently trained purport to emphasize the importance of refraining from “illegal” or “unlawful” activity and respecting “property rights.”¹⁶

104. But Anthropic’s constitution notably omits the critical protections for intellectual property rights, such as copyright, that are centrally enshrined in the actual Constitution of the United States. Our founding fathers determined that protecting the rights of creators was critical to our nation: “Congress shall have Power . . . To promote the Progress of Science and useful Arts, by securing for limited Times to Authors and Inventors the exclusive Right to their respective Writings and Discoveries.” U.S. Const. art. I, § 8, cl. 8. Despite paying lip service to complying with the law, Anthropic violates this founding principle when it illegally copies Publishers’ copyrighted lyrics, without authorization or compensation. Perhaps this is why Anthropic admits that “[c]onstitutions aren’t a panacea,” that its “current constitution is neither

¹⁵ Alvaro M. Bedoya, Statement of Commissioner Alvaro M. Bedoya Joined by Chair Lina M. Khan and Commissioner Rebecca Kelly Slaughter In the Matter of Amazon Alexa (United States v. Amazon.com, Inc.) (May 31, 2023), https://www.ftc.gov/system/files/ftc_gov/pdf/Bedoya-Statement-on-Alexa-Joined-by-LK-and-RKS-Final-1233pm.pdf.

¹⁶ *Claude’s Constitution*, ANTHROPIC (May 9, 2023), <https://www.anthropic.com/index/claudes-constitution>.

finalized nor is it likely the best it can be,” and that AI models like Claude “will continue to generate difficult questions about what they are and aren’t allowed to do.”¹⁷

F. *The Ongoing Harm to Publishers From Anthropic’s Infringement*

105. Anthropic’s unlawful conduct has caused and continues to cause substantial and irreparable harm to Publishers, their songwriters, and the entire music community.

106. Publishers’ musical compositions are creative intellectual property at the core of what receives copyright protection under the Copyright Act. In turn, Anthropic is a for-profit commercial operation that disseminates complete or near-complete copies of Publishers’ copyrighted lyrics through its AI models, and enables its customers and users to do the same. Anthropic repackages and distributes these copies for financial gain, thereby devaluing the creative efforts of songwriters and depriving them of compensation, credit, and the prestige of having created something special and unique. Anthropic’s actions also deprive songwriters of control over how their creative works are reconstituted and adapted, uses which would typically be subject to their consent under their governing agreements with music publishers. Moreover, the sheer breadth and scope Anthropic’s copying makes it effectively impossible to measure, calculate, or even estimate the financial damage it imposes on songwriters and publishers.

107. Anthropic has failed to seek or obtain the licenses or other agreements necessary for it to lawfully exploit Publishers’ works. Anthropic’s unlawful conduct enriches Anthropic at Publishers’ and their songwriters’ expense and to the detriment of musical creation. Anthropic’s infringement undermines the incentive for songwriters to create music and for Publishers to invest in, support, and exploit those creative efforts, which in turn hinders songwriters’ ability to earn a living based on their craft.

¹⁷ *Id.*

108. Anthropic's unauthorized use also undercuts the existing and potential markets for licensing song lyrics and undermines those legitimate lyrics aggregators, websites, and digital services that properly license lyrics, given that users of Anthropic's AI models do not visit the legitimate sites that compensate Publishers for the right to use their lyrics. Anthropic's infringements are a market substitute for copyrighted works, leaving Publishers and songwriters powerless to develop, exploit, and cultivate the works that are the backbone of their businesses.

109. Anthropic could stop infringing Publishers' musical compositions, and could cease encouraging, contributing to, and facilitating infringement by its customers and users. Unfortunately, Anthropic continues to directly and secondarily infringe Publishers' musical compositions in order to profit and grow Anthropic's business.

110. Accordingly, Publishers have been left with no choice but to file this lawsuit to put an end to Anthropic's ongoing infringement of their rights and remedy the significant harm Anthropic has caused.

CLAIMS FOR RELIEF

Count I—Direct Copyright Infringement

111. Publishers re-allege and incorporate by reference each and every allegation set forth in the preceding paragraphs 1 through 110 of this Complaint.

112. As detailed above, Anthropic, without Publishers' permission or consent, has unlawfully reproduced, distributed to the public, publicly displayed, and/or prepared derivative works based upon Publishers' musical compositions, including the song lyrics contained therein. Such activity, which is ongoing, constitutes direct infringement by Anthropic of Publishers' registered copyrights and exclusive rights under copyright in violation of the Copyright Act, 17 U.S.C. §§ 106(1)-(3), (5) and 501.

113. A non-exhaustive, exemplary list of the musical compositions for which Publishers are the legal or beneficial copyright owners, and which Anthropic has infringed, is attached hereto as Exhibit A.

114. Each infringement by Anthropic in and to Publishers' musical compositions constitutes a separate and distinct act of infringement.

115. Anthropic's acts of infringement are willful, intentional, and purposeful, in disregard of and with indifference to Publishers' rights.

116. As a direct and proximate result of Anthropic's wrongful conduct, which is ongoing, Publishers have been, and will continue to be, substantially and irreparably harmed in an amount not readily capable of determination. Publishers have no adequate remedy at law. Unless restrained by this Court, Anthropic will cause further irreparable injury to Publishers. Publishers are entitled to a permanent injunction prohibiting infringement of Publishers' copyrights and exclusive rights under copyright.

117. As a direct and proximate result of Anthropic's infringement of Publishers' copyrights and exclusive rights, Publishers are entitled to statutory damages, pursuant to 17 U.S.C. § 504(c). Alternatively, at Publishers' election, pursuant to 17 U.S.C. § 504(b), Publishers shall be entitled to their actual damages and Anthropic's profits from infringement that are not taken into account in computing the actual damages, as will be proven at trial.

118. Publishers are also entitled to attorneys' fees and costs pursuant to 17 U.S.C. § 505.

Count II—Contributory Infringement

119. Publishers re-allege and incorporate by reference each and every allegation set forth in the preceding paragraphs 1 through 110 of this Complaint.

120. As detailed above, the licensees and users of Anthropic's AI models, without Publishers' permission or consent, have unlawfully reproduced, distributed to the public, publicly displayed, and/or prepared derivative works based upon Publishers' musical compositions, including the song lyrics contained therein. Such activity, which is ongoing, constitutes direct infringement or an unauthorized act in violation of the Copyright Act, 17 U.S.C. §§ 106(1)-(3), (5) and 501.

121. Anthropic is contributorily liable for these direct infringements by licensees and/or users of its AI models as described herein.

122. As discussed above, Anthropic is well aware of its licensees' and users' infringing activity through its AI products. Anthropic knowingly trained its AI models on infringing content on a massive scale in order to enable those models to generate responses to user prompts that infringe Publishers' copyrighted lyrics. Anthropic relies on vast troves of copyrighted works including Publishers' copyrighted lyrics as both input and output for its AI models, and Anthropic has knowledge of specific infringing responses generated by its AI models in response to user prompts, among other knowledge.

123. Nevertheless, Anthropic facilitates, encourages, and materially contributes to such infringement, including, without limitation, by promoting its AI models, providing access to those models through its website and its API, and hosting and transmitting known infringing content via those models.

124. Anthropic has the means to take simple steps not to materially contribute to the specific infringing activity but fails to do so. Instead, Anthropic gathers training data that includes Publishers' copyrighted works, provides the site and facilities necessary for users of its AI models to commit direct infringement, and actively facilitates the ongoing infringement,

including via the actions described above. As a direct and proximate result, users of Anthropic's AI models have infringed Publishers' copyrights in the musical compositions.

125. Accordingly, Anthropic is contributorily liable for the infringement of Publishers' copyrighted musical compositions, including the song lyrics contained therein, in violation of Publishers' registered copyrights and exclusive rights under copyright in violation of the Copyright Act, 17 U.S.C. §§ 106(1)-(3), (5) and 501.

126. Through the activities set forth above, among others, Anthropic designs, operates, and maintains its AI models with the object of promoting their use to infringe Publishers and other copyright owners' copyrights. As a direct and proximate result of such actions, licensees and users of Anthropic's AI models have infringed Publishers' copyrighted musical compositions. Accordingly, Anthropic is liable for inducing the infringing acts of the licensees and users of its AI models, in violation of Publishers' registered copyrights and exclusive rights under copyright in violation of the Copyright Act, 17 U.S.C. §§ 106(1)-(3), (5) and 501.

127. A non-exhaustive, exemplary list of the musical compositions for which Publishers are the legal or beneficial copyright owners, and which Anthropic has infringed, is attached hereto as Exhibit A.

128. Each infringement of Publishers' musical compositions constitutes a separate and distinct act of infringement.

129. Anthropic's acts of infringement are willful, intentional, and purposeful, in disregard of and with indifference to Publishers' rights.

130. As a direct and proximate result of Anthropic's wrongful conduct, which is ongoing, Publishers have been, and will continue to be, substantially and irreparably harmed in an amount not readily capable of determination. Publishers have no adequate remedy at law.

Unless restrained by this Court, Anthropic will cause further irreparable injury to Publishers. Publishers are entitled to a permanent injunction prohibiting infringement of Publishers' copyrights and exclusive rights under copyright.

131. As a direct and proximate result of Anthropic's infringement of Publishers' copyrights and exclusive rights, Publishers are entitled to statutory damages, pursuant to 17 U.S.C. § 504(c). Alternatively, at Publishers' election, pursuant to 17 U.S.C. § 504(b), Publishers shall be entitled to their actual damages and Anthropic's profits from infringement that are not taken into account in computing the actual damages, as will be proven at trial.

132. Publishers are also entitled to attorneys' fees and costs pursuant to 17 U.S.C. § 505.

Count III—Vicarious Infringement

133. Publishers re-allege and incorporate by reference each and every allegation set forth in the preceding paragraphs 1 through 110 of this Complaint.

134. As detailed above, the licensees and users of Anthropic's AI models, without Publishers' permission or consent, have unlawfully reproduced, distributed to the public, publicly displayed, and/or prepared derivative works based upon Publishers' musical compositions, including the song lyrics contained therein. Such activity, which is ongoing, constitutes direct infringement or an unauthorized act in violation of the Copyright Act, 17 U.S.C. §§ 106(1)-(3), (5) and 501.

135. Anthropic is vicariously liable for these direct infringements by licensees and/or users of its AI models as described herein.

136. As discussed above, Anthropic has the legal right and practical ability to supervise and control the infringing activities that occur through and as a result of its AI models.

Anthropic has the ability to control both the input and output of its AI models based on how it develops and trains the models on an ongoing basis; it can monitor and review its AI models for harmful, infringing, or otherwise unlawful input and output; it has the ability to refine and finetune its AI models to address or remove such harmful, infringing, or otherwise unlawful input and output; it can control and limit user access to its AI models available through its website and as API (including by terminating such access altogether, pursuant to its terms of service); and it can monitor and review user interactions with its AI models, among other rights and abilities to supervise and control the infringing activities.

137. At all relevant times, Anthropic has derived a direct financial benefit from licensees and users' infringement of Publishers' copyrighted musical compositions through Anthropic's AI models. As discussed above, Anthropic has commercialized its AI models in a number of ways, including by selling API access to commercial customers on a per-word basis. Through this pay-as-you-go subscription model, Anthropic receives revenues every time a user submits a request for Publishers' song lyrics through the API, and again every time the API generates output copying or relying on those lyrics. Among other financial benefits, Anthropic has also received billions of dollars in commercial funding in connection with the development of its AI models, and it has saved a substantial amount of money by failing to properly pay licensing fees for the use of Publishers' copyrighted lyrics.

138. Publishers' lyrics are also a draw for licensees and users. Anthropic's AI models have value and are in high demand because of the underlying text corpus that includes Publishers' copyrighted lyrics, among other reasons. Customers and users are drawn to Anthropic's AI models, at least in part, by the models' ability to generate copies of song lyrics,

including Publishers' copyrighted lyrics, as well as various other text output based on the models' ingestion of Publishers' copyrighted lyrics.

139. Anthropic has refused to take reasonable steps to prevent the widespread infringement by users of its AI models. As a direct and proximate result of such refusal, users of Anthropic's AI models have infringed Publishers' copyrights in the musical compositions.

140. Accordingly, Anthropic is vicariously liable for the infringement of Publishers' copyrighted musical compositions, including the song lyrics contained therein, in violation of Publishers' registered copyrights and exclusive rights under copyright in violation of the Copyright Act, 17 U.S.C. §§ 106(1)-(3), (5) and 501.

141. A non-exhaustive, exemplary list of the musical compositions for which Publishers are the legal or beneficial copyright owners, and which Anthropic has infringed, is attached hereto as Exhibit A.

142. Each infringement of Publishers' musical compositions constitutes a separate and distinct act of infringement.

143. Anthropic's acts of infringement are willful, intentional, and purposeful, in disregard of and with indifference to Publishers' rights.

144. As a direct and proximate result of Anthropic's wrongful conduct, which is ongoing, Publishers have been, and will continue to be, substantially and irreparably harmed in an amount not readily capable of determination. Publishers have no adequate remedy at law. Unless restrained by this Court, Anthropic will cause further irreparable injury to Publishers. Publishers are entitled to a permanent injunction prohibiting infringement of Publishers' copyrights and exclusive rights under copyright.

145. As a direct and proximate result of Anthropic's infringement of Publishers' copyrights and exclusive rights, Publishers are entitled to statutory damages, pursuant to 17 U.S.C. § 504(c). Alternatively, at Publishers' election, pursuant to 17 U.S.C. § 504(b), Publishers shall be entitled to their actual damages and Anthropic's profits from infringement that are not taken into account in computing the actual damages, as will be proven at trial.

146. Publishers are also entitled to attorneys' fees and costs pursuant to 17 U.S.C. § 505.

Count IV—Removal or Alteration of Copyright Management Information

147. Publishers re-allege and incorporate by reference each and every allegation set forth in the preceding paragraphs 1 through 110 of this Complaint.

148. The titles of Publishers' musical compositions, the name and other identifying information about the authors of those musical compositions, and the name and other identifying information about the copyright owners of those musical compositions, including the song lyrics contained therein, constitute copyright management information under the Copyright Act, 17 U.S.C. § 1202.

149. As detailed above, Anthropic has intentionally removed or altered copyright management information from Publishers' musical compositions, and/or distributed or imported for distribution copies of Publishers' musical compositions knowing that copyright management information has been removed or altered, without Publishers' authorization and in violation of the Copyright Act, 17 U.S.C. § 1202(b). Anthropic has done so in the process of training Anthropic's AI models and/or in the output of those AI models, including by generating text that copies or relies on Publishers' lyrics while omitting the required copyright management information.

150. Anthropic's acts of infringement are willful, intentional, and purposeful, in disregard of and with indifference to Publishers' rights.

151. As a direct and proximate result of Anthropic's wrongful conduct, which is ongoing, Publishers have been, and will continue to be, substantially and irreparably harmed in an amount not readily capable of determination. Publishers have no adequate remedy at law. Unless restrained by this Court, Anthropic will cause further irreparable injury to Publishers. Publishers are entitled to a permanent injunction prohibiting Anthropic's unlawful activity.

152. As a direct and proximate result of Anthropic's unlawful activity, Publishers are entitled to statutory damages, pursuant to 17 U.S.C. § 1203(c)(3)(B). Alternatively, at Publishers' election, pursuant to 17 U.S.C. § 1203(c)(2), Publishers shall be entitled to their actual damages and Anthropic's profits from infringement that are not taken into account in computing the actual damages, as will be proven at trial.

153. Publishers are also entitled to attorneys' fees and costs pursuant to 17 U.S.C. § 1203(b)(4)-(5).

PRAYER FOR RELIEF

By reason of the facts and circumstances alleged above, Publishers seek relief against Anthropic as follows:

a. Judgment on each of the claims set forth above, including that Anthropic has directly and secondarily infringed Publishers' copyrights under the Copyright Act, that Anthropic has unlawfully removed and/or altered Publishers' copyright management information in violation of the Copyright Act, and that such infringement and unlawful activity was willful;

b. An order 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 Publishers' copyrights

and removal or alteration of Publishers' copyright management information, including a preliminary and permanent injunction requiring that Anthropic and its officers, agents, servants, employees, attorneys, directors, successors, assigns, licensees, and all others in active concert or participation with any of them, cease directly infringing, indirectly infringing, and/or removing or altering copyright management information, or causing, aiding, enabling, facilitating, encouraging, promoting, inducing, or materially contributing to or participating in the infringement of any of Publishers' exclusive rights under copyright, including without limitation in the musical compositions in Exhibit A;

c. An order requiring Anthropic to pay Publishers statutory damages in an amount up to the maximum provided by law, arising from Anthropic's willful violations of Publishers' rights under the Copyright Act, including in an amount up to \$150,000 per work infringed, pursuant to 17 U.S.C. § 504(c); or in the alternative, at Publishers' election, Publishers' actual damages and Anthropic's profits from the infringement, in an amount to be proven at trial, pursuant to 17 U.S.C. § 504(b);

d. An order requiring Anthropic to pay Publishers statutory damages in an amount up to the maximum provided by law, arising from Anthropic's removal and/or alteration of Publishers' copyright management information in violation of the Copyright Act, including in an amount up to \$25,000 per violation, pursuant to 17 U.S.C. § 1203(c)(3)(B); or in the alternative, at Publishers' election, Publishers' actual damages and Anthropic's profits, in an amount to be proven at trial, pursuant to 17 U.S.C. § 1203(c)(2);

e. An order requiring Anthropic to provide an accounting of the training data, training methods, and known capabilities of its AI models, including requiring that Anthropic identify the Publishers' lyrics and other copyrighted works on which it has trained its AI models,

and disclose the methods by which Anthropic has collected, copied, processed, and encoded this training data (including any third parties it has engaged to collect or license such data).

f. An order requiring that Anthropic destroy under the Court's supervision all infringing copies of Publishers' copyrighted works in Anthropic's possession or control, and then file a sworn report setting forth in detail the manner in which it has complied with the aforesaid order, pursuant to 17 U.S.C. § 503(b);

g. Publishers' reasonable attorneys' fees and costs in this action, pursuant to 17 U.S.C. § 505 and/or 17 U.S.C. § 1203(b)(4)-(5);

h. Pre-judgment and post-judgment interest at the applicable rate on any monetary award made part of the judgment against Anthropic; and

i. Such other and further relief as the Court deems proper.

JURY TRIAL DEMAND

Publishers hereby request a trial by jury.

Dated: October 18, 2023

Respectfully submitted,

/s/ Steven A. Riley
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Tim Harvey (No. 21509)
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Attorneys for Plaintiffs

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

CONCORD MUSIC GROUP, INC., et al.

(b) County of Residence of First Listed Plaintiff Davidson County, TN
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Steven A. Riley, Timothy Harvey, Riley & Jacobson,
PLC, 1906 West End Ave., Nashville, TN 37203, (615) 555-1111

DEFENDANTS

ANTHROPIC PBC

County of Residence of First Listed Defendant San Francisco, CA
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
- 3 Federal Question (U.S. Government Not a Party)
- 2 U.S. Government Defendant
- 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		PTF	DEF
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS			
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

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):
The Copyright Act of 1976, 17 U.S.C. §§ 101 et seq.

Brief description of cause:
Claims of direct, contributory, and vicarious copyright infringement and removal/alteration of copyright management information

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:
As Per 17 U.S.C. § 504 JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE _____ DOCKET NUMBER _____

DATE SIGNATURE OF ATTORNEY OF RECORD

Oct 18, 2023 s/ Steven A. Riley

FOR OFFICE USE ONLY

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading 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. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC.; CAPITOL
CMG, INC. D/B/A ARIOSE MUSIC, D/B/A
CAPITOL CMG GENESIS, D/B/A CAPITOL
CMG PARAGON, D/B/A GREG NELSON
MUSIC, D/B/A JUBILEE
COMMUNICATIONS, INC., D/B/A
MEADOWGREEN MUSIC COMPANY, D/B/A
MEAUX HITS, D/B/A MEAUX MERCY,
D/B/A RIVER OAKS MUSIC, D/B/A
SHEPHERD’S FOLD MUSIC, D/B/A
SPARROW SONG, D/B/A WORSHIP
TOGETHER MUSIC, D/B/A
WORSHIPTOGETHER.COM SONGS;
UNIVERSAL MUSIC CORP. D/B/A ALMO
MUSIC CORP., D/B/A CRITERION MUSIC
CORP., D/B/A GRANITE MUSIC CORP.,
D/B/A IRVING MUSIC, INC., D/B/A
MICHAEL H. GOLDSSEN, INC., D/B/A
UNIVERSAL – GEFFEN MUSIC, D/B/A
UNIVERSAL MUSIC WORKS; SONGS OF
UNIVERSAL, INC. D/B/A UNIVERSAL –
GEFFEN AGAIN MUSIC, D/B/A UNIVERSAL
TUNES; UNIVERSAL MUSIC – MGB NA
LLC D/B/A MULTISONGS, D/B/A
UNIVERSAL MUSIC – CAREERS, D/B/A
UNIVERSAL MUSIC – MGB SONGS;
POLYGRAM PUBLISHING, INC. D/B/A
UNIVERSAL – POLYGRAM
INTERNATIONAL TUNES, INC., D/B/A
UNIVERSAL – POLYGRAM
INTERNATIONAL PUBLISHING, INC., D/B/A
UNIVERSAL – SONGS OF POLYGRAM
INTERNATIONAL, INC.; UNIVERSAL
MUSIC – Z TUNES LLC D/B/A NEW SPRING
PUBLISHING, D/B/A UNIVERSAL MUSIC –
BRENTWOOD BENSON PUBLISHING,
D/B/A UNIVERSAL MUSIC – BRENTWOOD
BENSON SONGS, D/B/A UNIVERSAL
MUSIC – BRENTWOOD BENSON TUNES,
D/B/A UNIVERSAL MUSIC – Z MELODIES,

Case No. _____

**COMPLAINT AND
DEMAND FOR JURY TRIAL**

D/B/A UNIVERSAL MUSIC – Z SONGS; and
ABKCO MUSIC, INC.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

ATTACHMENT TO CIVIL COVER SHEET

The Plaintiffs in this matter are as follows:

1. Concord Music Group, Inc.;
2. Capitol CMG, Inc. d/b/a Ariose Music, d/b/a Capitol CMG Genesis, d/b/a Capitol CMG Paragon, d/b/a Greg Nelson Music, d/b/a Jubilee Communications, Inc., d/b/a Meadowgreen Music Company, d/b/a Meaux Hits, d/b/a Meaux Mercy, d/b/a River Oaks Music, d/b/a Shepherd's Fold Music, d/b/a Sparrow Song, d/b/a Worship Together Music, d/b/a Worshiptogether.com Songs;
3. Universal Music Corp. d/b/a Almo Music Corp., d/b/a Criterion Music Corp., d/b/a Granite Music Corp., d/b/a Irving Music, Inc., d/b/a Michael H. Goldsen, Inc., d/b/a Universal – Geffen Music, d/b/a Universal Music Works;
4. Songs of Universal, Inc. d/b/a Universal – Geffen Again Music, d/b/a Universal Tunes;
5. Universal Music – MGB NA LLC d/b/a Multisongs, d/b/a Universal Music – Careers, d/b/a Universal Music – MGB Songs;
6. Polygram Publishing, Inc. d/b/a Universal – Polygram International Tunes, Inc., d/b/a Universal – Polygram International Publishing, Inc., d/b/a Universal – Songs of Polygram International Inc.;
7. Universal Music – Z Tunes LLC d/b/a New Spring Publishing, d/b/a Universal Music – Brentwood Benson Publishing, d/b/a Universal Music – Brentwood Benson Songs, d/b/a Universal Music – Brentwood Benson Tunes, d/b/a Universal Music – Z Melodies, d/b/a Universal Music – Z Songs; and
8. ABKCO Music, Inc.

EXHIBIT A

	Title	Plaintiff	Registration No.
1	7 RINGS	Concord Music Group, Inc.	PA0002187265
2	CENTURIES	Concord Music Group, Inc.	PA0001961647
3	DANCING WITH A STRANGER	Concord Music Group, Inc.	PA0002185007
4	DIAMONDS	Concord Music Group, Inc.	PA0001845153
5	DIE YOUNG	Concord Music Group, Inc.	PA0001850818
6	DONTTRUSTME	Concord Music Group, Inc.	PA0001653773
7	DUSK TILL DAWN	Concord Music Group, Inc.	PA0002185366
8	GRENADÉ	Concord Music Group, Inc.	PA0002182938
9	HALO	Concord Music Group, Inc.	PA0001642019; PA0001682642
10	HIPS DON'T LIE	Concord Music Group, Inc.	PA0001367687; PAu003149121
11	KICKSTART MY HEART	Concord Music Group, Inc.	PA0000440232
12	LAST FRIDAY NIGHT (T.G.I.F.)	Concord Music Group, Inc.	PA0001711655; PA0001396980; PA0001753637
13	LOVE YOU LIKE A LOVE SONG	Concord Music Group, Inc.	PA0001869961
14	MAPS	Concord Music Group, Inc.	PA0001947799
15	MARRY ME	Concord Music Group, Inc.	PA0002120132; PA0002138910; PA0002130922
16	ME AND MY BROKEN HEART	Concord Music Group, Inc.	PA0001959686
17	MEANT TO BE	Concord Music Group, Inc.	PA0002105522
18	NOTHING BREAKS LIKE A HEART	Concord Music Group, Inc.	PA0002182042
19	ROAR	Concord Music Group, Inc.	PA0001860200
20	RUMOUR HAS IT	Concord Music Group, Inc.	PA0001738213
21	SOMEBODY ELSE	Concord Music Group, Inc.	PA0002015511
22	TIK TOK	Concord Music Group, Inc.	PA0001688442
23	TIME AFTER TIME	Concord Music Group, Inc.	PA0000238686; PA0000299757
24	TURNING TABLES	Concord Music Group, Inc.	PA0001738213
25	UNSTOPPABLE	Concord Music Group, Inc.	PA0002134877
26	UPTOWN FUNK	Concord Music Group, Inc.	PA0001938200
27	WHAT A WONDERFUL WORLD	Concord Music Group, Inc.	EU0000010029; RE0000689584; RE0000704744
28	ADORE YOU	Concord Music Group, Inc.; Polygram Publishing, Inc.	PA0002250803; PA0002265129
29	BLEEDING LOVE	Concord Music Group, Inc.; Universal Music Corp.	PA0001613694
30	CALIFORNIA GURLS	Concord Music Group, Inc.; Universal Music Corp.	PA0001711654; PA0001396981; PA0001734423
31	GOLDEN	Concord Music Group, Inc.; Polygram Publishing, Inc.	PA0002250726; PA0002265133
32	HUMBLE AND KIND	Concord Music Group, Inc.; Songs Of Universal, Inc.	PA0002032466; PA0002130282
33	MOVES LIKE JAGGER	Concord Music Group, Inc.; Universal Music - Z Tunes LLC	PA0001801572
34	PAYPHONE	Concord Music Group, Inc.; Universal Music - Z Tunes LLC	PA0001824573; PA0001849242
35	SIGN OF THE TIMES	Concord Music Group, Inc.; Universal Music Corp.	PA0002085488
36	STAY	Concord Music Group, Inc.; Songs Of Universal, Inc.	PA0002316799; PA0002345926; PA0002370561

	Title	Plaintiff	Registration No.
37	STEREO HEARTS	Concord Music Group, Inc.; Universal Music - Z Tunes LLC	PA0001806415
38	WANNABE	Concord Music Group, Inc.; Polygram Publishing, Inc.	PA0000823685
39	WATERMELON SUGAR	Concord Music Group, Inc.; Polygram Publishing, Inc.	PA0002250681; PA0002265071
40	WE BUILT THIS CITY	Concord Music Group, Inc.; Universal Music - MGB NA LLC	PA0000265529; PA0000264311
41	A CHANGE IS GONNA COME	ABKCO Music, Inc.	EU0000816632; RE0000570151
42	ANOTHER SATURDAY NIGHT	ABKCO Music, Inc.	EU0000766723; RE0000516155
43	BITTERSWEET SYMPHONY	ABKCO Music, Inc.	PAu002199365
44	BRING IT ON HOME TO ME	ABKCO Music, Inc.	EU0000719893; RE0000475464; EP0000166883; RE0000475432
45	BROWN SUGAR	ABKCO Music, Inc.	EU0000235987
46	CUPID	ABKCO Music, Inc.	EU0000668349; RE0000446794
47	DEAD FLOWERS	ABKCO Music, Inc.	EP0000289677
48	GIMME SHELTER	ABKCO Music, Inc.	EU0000154592
49	HONKY TONK WOMEN	ABKCO Music, Inc.	EU0000125715
50	IT'S ALL OVER NOW	ABKCO Music, Inc.	EU0000824981; RE0000570496
51	JUMPIN' JACK FLASH	ABKCO Music, Inc.	EU0000053487
52	MAMA SAID	ABKCO Music, Inc.	EU0000655257; RE0000446770
53	MOONLIGHT MILE	ABKCO Music, Inc.	EP0000289679
54	PLAY WITH FIRE	ABKCO Music, Inc.	EU0000874314; PAu001489708
55	SALT OF THE EARTH, THE	ABKCO Music, Inc.	EU0000084522
56	SHE'S A RAINBOW	ABKCO Music, Inc.	EU0000031919
57	SHINE A LIGHT	ABKCO Music, Inc.	EU0000326812
58	STREET FIGHTING MAN	ABKCO Music, Inc.	EU0000070720
59	SYMPATHY FOR THE DEVIL	ABKCO Music, Inc.	EU0000075421
60	TWISTIN' THE NIGHT AWAY	ABKCO Music, Inc.	EU0000701315; RE0000475433
61	WILD HORSES	ABKCO Music, Inc.	EU0000180744
62	WONDERFUL WORLD	ABKCO Music, Inc.	EU0000567694; RE0000361641
63	YOU CAN'T ALWAYS GET WHAT YOU WANT	ABKCO Music, Inc.	EU0000099333
64	YOU SEND ME	ABKCO Music, Inc.	EU0000491316; RE0000233851
65	WE BELONG TOGETHER	ABKCO Music, Inc.; Universal Music - MGB NA LLC	PA0001162027; PA0001163150
66	(SITTIN' ON) THE DOCK OF THE BAY	Universal Music Corp.	EU0000033492; RE0000760653; PAu002069906
67	10,000 REASONS (BLESS THE LORD)	Capitol CMG, Inc.	PA0001751588
68	A BEAUTIFUL LIE	Universal Music - Z Tunes LLC	PA0001630062
69	A FOREST	Universal Music - MGB NA LLC	PA0000194922
70	A PLACE FOR MY HEAD	Universal Music - Z Tunes LLC	PA0001092514
71	A THOUSAND MILES	Songs of Universal, Inc.	PA0001102367
72	ACHY BREAKY HEART	Polygram Publishing, Inc.	PA0000534864
73	AIN'T NO SUNSHINE	Songs of Universal, Inc.	EU0000243844; RE0000827146
74	AJA	Universal Music Corp.	EU0000811347; RE0000910216
75	ALL ALONG THE WATCHTOWER	Songs of Universal, Inc.	EU0000032648; RE0000739070
76	ALL I REALLY WANT TO DO	Songs of Universal, Inc.	EU0000848258; RE0000588423; EP0000195706; RE0000588403

	Title	Plaintiff	Registration No.
77	ALL I WANTED	Capitol CMG, Inc.	PA0001676908
78	ALWAYS	Universal Music Corp.	PA0001243938
79	ALWAYS	Capitol CMG, Inc.	PA0001766253
80	AMERICAN GIRL	Universal Music Corp.	EU0000721156; RE0000890825
81	AMERICAN PIE	Songs of Universal, Inc.	EU0000284299; RE0000803730
82	ANACONDA	Songs of Universal, Inc.	PA0002062630
83	ANARCHY IN THE U.K.	Universal Music - MGB NA LLC; Polygram Publishing, Inc.	EU0000853584; PAu001125351; RE0000932107; PA0000369943
84	AND I AM TELLING YOU I'M NOT GOING	Universal Music Corp.; Songs of Universal, Inc.	PAu000365845; PAu000395732; PAu000440080
85	AND I LOVE YOU SO	Songs of Universal, Inc.	EU0000201220; RE0000771158; EP0000311666; RE0000829100
86	ANGEL	Polygram Publishing, Inc.	PA0000342822
87	ANGEL EYES	Universal Music - MGB NA LLC	PA0000385332
88	ANGELES	Universal Music - MGB NA LLC	PA0000859623
89	ANGELS	Polygram Publishing, Inc.	PA0001816076
90	ANY MAJOR DUDE WILL TELL YOU	Universal Music Corp.	EU0000469050; RE0000854810
91	AS THE DEER	Universal Music - Z Tunes LLC	PA0000315393
92	AT THE CROSS (LOVE RAN RED)	Capitol CMG, Inc.; Universal Music - Z Tunes LLC	PA0001910159
93	ATTACK	Universal Music - Z Tunes LLC	PA0001630069
94	AWAKE MY SOUL	Polygram Publishing, Inc.	PA0001932490
95	AWAY FROM THE SUN	Songs of Universal, Inc.	PA0001120567
96	BABY BABY	Universal Music - Z Tunes LLC	PA0000512809
97	BACK AT ONE	Polygram Publishing, Inc.	PA0001203871
98	BALLAD OF A THIN MAN	Songs of Universal, Inc.	EU0000903127; RE0000647444
99	BALLROOM BLITZ	Universal Music - MGB NA LLC	PAu000066844
100	BARRACUDA	Universal Music Corp.; Universal Music - MGB NA LLC	EU0000791168; RE0000910167; EU0000789263; RE0000910161
101	BEAUTIFUL THINGS	Capitol CMG, Inc.	PA0001734874
102	BECAUSE I GOT HIGH	Universal Music Corp.	PA0001123416
103	BENNIE AND THE JETS	Polygram Publishing, Inc.	EFO000170947; RE0000838312
104	BEST THING THAT EVER HAPPENED TO ME	Polygram Publishing, Inc.	EU0000376780; RE0000823172
105	BLEED IT OUT	Universal Music - Z Tunes LLC	PA0001602887; PA0001167572
106	BLEEDING OUT	Songs of Universal, Inc.	PA0001816018
107	BLESS THE BROKEN ROAD	Universal Music - MGB NA LLC	PA0000734451
108	BLOWIN' IN THE WIND	Songs of Universal, Inc.	EU0000731107; RE0000481471
109	BODHISATTVA	Universal Music Corp.	EU0000416548; RE0000837424
110	BONFIRE	Songs of Universal, Inc.	PA0001773709
111	BOOGIE WOOGIE BUGLE BOY	Universal Music Corp.	EU0000238602; R00000425178
112	BORN TO BE WILD	Songs of Universal, Inc.	EU0000035989; RE0000722455
113	BOYS DON'T CRY	Universal Music - MGB NA LLC	PA0000205033
114	BREAK STUFF	Universal Music - Z Tunes LLC	PA0001021053
115	BREAKFAST IN AMERICA	Universal Music Corp.	PA0000032062
116	BREAKING THE HABIT	Universal Music - Z Tunes LLC	PA0001256418
117	BREAKING UP IS HARD TO DO	Universal Music - MGB NA LLC	EP0000165278; RE0000501238; RE0000491450; EU0000724459; RE0000491465; RE0000501221

	Title	Plaintiff	Registration No.
118	BREATHE ME	Universal Music - MGB NA LLC	PA0001164903; PA0001338526
119	BREATHING	Universal Music - MGB NA LLC	PA0001158186
120	BRIMFUL OF ASHA	Polygram Publishing, Inc.	PA0000988476
121	BUILD MY LIFE	Capitol CMG, Inc.	PA0002076039
122	BURN IT DOWN	Universal Music - Z Tunes LLC	PA0001805742
123	BURNING IN THE SKIES	Universal Music - Z Tunes LLC	PA0001725616
124	BY MYSELF	Universal Music - Z Tunes LLC	PA0001092512
125	CALIFORNIA DREAMIN'	Universal Music Corp.	EU0000918773; RE0000635860
126	CALIFORNIA GIRLS	Universal Music Corp.	EU0000890216; RE0000610581; PAu002079518; EU0000212915; RE0000775518; PAu002079809
127	CAN'T GET YOU OUT OF MY HEAD	Universal Music Corp.	PA0001136727
128	CANDLE IN THE WIND	Polygram Publishing, Inc.	EFO000170947; RE0000838312
129	CASTLE OF GLASS	Universal Music - Z Tunes LLC	PA0001805745
130	CHASING CARS	Polygram Publishing, Inc.	PA0001990266
131	CHEEK TO CHEEK	Universal Music Corp.	EU0000097144; R000000289527
132	CHILDREN'S STORY	Songs of Universal, Inc.	PA0000449656
133	CHRISTMAS LIGHTS	Universal Music - MGB NA LLC	PA0001969616
134	CLOSER	Universal Music - Z Tunes LLC	PA0001395685
135	CLOSER TO FINE	Songs of Universal, Inc.	PA0000451204
136	COLORS	Songs of Universal, Inc.	PA0002059980
137	COME AS YOU ARE	Capitol CMG, Inc.	PA0001910192
138	COME SAIL AWAY	Universal Music Corp.	EU0000828640; RE0000910690
139	COMING HOME	Songs of Universal, Inc.; Universal Music - Z Tunes LLC	PA0001751168
140	CONTROL	Songs of Universal, Inc.	PA0002060006
141	COPACABANA	Songs of Universal, Inc.; Universal Music - MGB NA LLC	PAu000009986
142	COSMIC LOVE	Polygram Publishing, Inc.	PA0001892799
143	COURT OF THE CRIMSON KING	Universal Music - MGB NA LLC	EU0000148405; RE0000755409
144	COWARD OF THE COUNTY	Universal Music Corp.; Universal Music - MGB NA LLC	PA0000039661
145	CRAWLING	Universal Music - Z Tunes LLC	PA0001092510
146	CROCODILE ROCK	Polygram Publishing, Inc.	EFO000159444; RE0000822540
147	CRUEL TO BE KIND	Universal Music - MGB NA LLC	PA0000022753
148	DADDY SANG BASS	Polygram Publishing, Inc.	EU0000088125; RE0000723367; EP0000377413; RE0000750614
149	DARE YOU TO MOVE (I DARE YOU TO MOVE)	Capitol CMG, Inc.	PA0001044236
150	DE DO DO DO, DE DA DA DA	Songs of Universal, Inc.	PA0000089745
151	DEACON BLUES	Universal Music Corp.	EU0000811348; RE0000910217; PA0000003182
152	DEMONS	Songs of Universal, Inc.	PA0001796478
153	DESERT ROSE	Songs of Universal, Inc.	PA0000976583; PA0001038417; PA0001074378
154	DESOLATION ROW	Songs of Universal, Inc.	EU0000905799; RE0000647455
155	DISTURBIA	Songs of Universal, Inc.; Universal Music Corp.	PA0001692669
156	DO IT AGAIN	Universal Music Corp.	EU0000353004; RE0000823108

	Title	Plaintiff	Registration No.
157	DO WAH DIDDY DIDDY	Polygram Publishing, Inc.	EU0000796084; RE0000529632; EP0000193467; RE0000585084
158	DOG DAYS ARE OVER	Polygram Publishing, Inc.	PA0001892802
159	DON'T CRY FOR ME ARGENTINA	Universal Music Corp.	EF0000041481; RE0000891073
160	DON'T MIND	Songs of Universal, Inc.; Universal Music - Z Tunes LLC	PA0002047004; PA0002048732
161	DON'T STAND SO CLOSE TO ME	Songs of Universal, Inc.	PA0000089740
162	DON'T STAY	Universal Music - Z Tunes LLC	PA0001256411
163	DON'T STOP	Universal Music - MGB NA LLC	EU0000713074; RE0000904499; EP0000373131
164	DON'T WORRY BABY	Universal Music Corp.; Universal Music - MGB NA LLC	EU0000818195; RE0000604378; RE0000574344
165	DRIFT AWAY	Universal Music Corp.	EP0000312071; PA0000790342; EU0000331792; PAu002121140; RE0000816855
166	EASIER TO RUN	Universal Music - Z Tunes LLC	PA0001256414
167	ENGLISHMAN IN NEW YORK	Songs of Universal, Inc.	PA0000351652; PA0001038425
168	EVER FALLEN IN LOVE WITH SOMEONE YOU SHOULDN'T'VE	Universal Music - MGB NA LLC	PA0000067070
169	EVERGLOW	Universal Music - MGB NA LLC	PA0002031153
170	EVERY BREATH YOU TAKE	Songs of Universal, Inc.	PA0000201652; PA0001038430
171	EVERY GRAIN OF SAND	Songs of Universal, Inc.	PAu000237620; PA0000115557
172	EVERY LITTLE THING SHE DOES IS MAGIC	Songs of Universal, Inc.	PA0000127302
173	EVERY TEARDROP IS A WATERFALL	Universal Music - MGB NA LLC; Universal Music Corp.	PA0001766995
174	EVERYWHERE	Universal Music - MGB NA LLC	PAu000853444; PA0000332445
175	EYE IN THE SKY	Universal Music - MGB NA LLC	PA0000144130
176	FACE DOWN	Songs of Universal, Inc.	PA0001376457
177	FAINT	Universal Music - Z Tunes LLC	PA0001256417
178	FATHER OF MINE	Songs of Universal, Inc.; Universal Music Corp.	PA0000873792
179	FERRY 'CROSS THE MERSEY	Polygram Publishing, Inc.	EF0000104733; RE0000573321
180	FIELDS OF GOLD	Songs of Universal, Inc.	PA0000618389; PA0001038420
181	FIREFLIES	Universal Music Corp.	PA0001692976
182	FIX YOU	Universal Music - MGB NA LLC	PA0001700422
183	FLAVOR OF THE WEEK	Universal Music - MGB NA LLC	PA0000981396
184	FLY	Songs of Universal, Inc.	PA0001745306
185	FOR THE FIRST TIME	Universal Music - Z Tunes LLC	PA0001746223
186	FOR THE GOOD TIMES	Universal Music - MGB NA LLC	EP0000248830; RE0000718330
187	FOREVER	Songs of Universal, Inc.; Universal Music Corp.	PA0001677037
188	FORGOTTEN	Universal Music - Z Tunes LLC	PA0001092515
189	FRAGILE	Songs of Universal, Inc.	PA0000351655; PA0001038440
190	FREE BIRD	Songs of Universal, Inc.	EU0000450840; RE0000838872; RE0000852176
191	FRESH PRINCE OF BEL-AIR	Universal Music - Z Tunes LLC	PAu001887849
192	FRIDAY I'M IN LOVE	Universal Music - MGB NA LLC	PA0001073351
193	FRIENDS	Capitol CMG, Inc.	PA0000154225
194	FRIENDS IN LOW PLACES	Universal Music - MGB NA LLC	PA0000485587

	Title	Plaintiff	Registration No.
195	FROM THE BOTTOM OF MY BROKEN HEART	Universal Music - Z Tunes LLC	PA0000932241
196	FROM THE INSIDE	Universal Music - Z Tunes LLC	PA0001256421
197	FUN, FUN, FUN	Universal Music Corp.	EU0000807824; RE0000574318
198	GIMME SOME LOVIN'	Polygram Publishing, Inc.	EF0000031746; RE0000657899
199	GIMME THREE STEPS	Songs of Universal, Inc.	EU0000448562; RE0000851733
200	GIRLS JUST WANNA HAVE FUN	Universal Music - MGB NA LLC	PA0000532922
201	GIVEN UP	Universal Music - Z Tunes LLC	PA0001167570; PA0001602906
202	GOD MUST HAVE SPENT A LITTLE MORE TIME ON YOU	Songs of Universal, Inc.	PA0000982175
203	GOD OF WONDERS	Capitol CMG, Inc.; Universal Music - Z Tunes LLC	PA0001305795
204	GOD ONLY KNOWS	Universal Music Corp.	EU0000948189; RE0000662431
205	GOD SAVE THE QUEEN (NO FUTURE)	Universal Music - MGB NA LLC	PAu001125349
206	GOOD GOOD FATHER	Capitol CMG, Inc.	PA0002296837
207	GOOD VIBRATIONS	Universal Music Corp.	EU0000964030; RE0000654512
208	GOODBYE YELLOW BRICK ROAD	Polygram Publishing, Inc.	EFO000170947; RE0000838312
209	GOODNESS OF GOD	Capitol CMG, Inc.	PA0002394586; PA0002186334
210	GOTTA SERVE SOMEBODY	Songs of Universal, Inc.	PAu000110766; PAu000137092
211	GRANDMA'S HANDS	Songs of Universal, Inc.	EU0000243847; RE0000827149
212	GREAT IS THE LORD	Capitol CMG, Inc.	PA0000158291
213	GREEN EYES	Universal Music - MGB NA LLC	PA0001073305
214	GYPSYS, TRAMPS AND THIEVES	Universal Music - MGB NA LLC	EU0000271991; RE0000728553
215	HALL OF FAME	Universal Music - Z Tunes LLC	PA0001828622
216	HARD TO SAY I'M SORRY	Universal Music - MGB NA LLC	PA0000142242; PA0000150388
217	HARDER TO BREATHE	Universal Music - MGB NA LLC	PA0001073084
218	HATE THAT I LOVE YOU	Universal Music - Z Tunes LLC	PA0001641335
219	HAVE A LITTLE FAITH IN ME	Universal Music - MGB NA LLC	PA0000343117
220	HE IS EXALTED	Capitol CMG, Inc.	PA0000296457
221	HE REIGNS	Capitol CMG, Inc.	PA0001226974
222	HELLO AGAIN	Songs of Universal, Inc.; Universal Music Corp.	PAu000193778; PA0000506680
223	HELP ME RHONDA	Universal Music Corp.	EU0000868745; RE0000610558; PAu002079506
224	HEMORRHAGE (IN MY HANDS)	Polygram Publishing, Inc.	PA0001025282; PA0001103603
225	HERE	Songs of Universal, Inc.; Universal Music Corp.	PA0002049195
226	HERE WITHOUT YOU	Songs of Universal, Inc.	PA0001120571
227	HERE'S MY HEART	Capitol CMG, Inc.	PA0001839539
228	HIGHWAY 61 REVISITED	Songs of Universal, Inc.	EU0000903131; RE0000647447
229	HOLD ON LOOSELY	Universal Music - MGB NA LLC	PA0000106829
230	HOUSE AT POOH CORNER	Universal Music Corp.	EU0000104835; RE0000749927
231	HOW GREAT IS OUR GOD	Capitol CMG, Inc.	PA0001299530
232	HOW SOON IS NOW	Polygram Publishing, Inc.	PA0000243097
233	HURRICANE	Songs of Universal, Inc.	EU0000613348; EU0000633490
234	HURRICANE	Universal Music - Z Tunes LLC	PA0002076980
235	I AM NOT ALONE	Capitol CMG, Inc.	PA0001903579
236	I AM WOMAN	Universal Music Corp.	EU0000264747; RE0000799367
237	I AM...I SAID	Songs of Universal, Inc.	EU0000239274; RE0000797642

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238	I BELIEVE I CAN FLY	Universal Music - Z Tunes LLC	PA0000848248
239	I BET MY LIFE	Songs of Universal, Inc.	PA0001938182; PA0001999963
240	I CAN LOVE YOU BETTER	Polygram Publishing, Inc.	PA0000545908
241	I CAN'T MAKE YOU LOVE ME	Universal Music Corp.; Universal Music - MGB NA LLC	PA0000535292
242	I CAN'T STAND THE RAIN	Universal Music Corp.	EU0000420732; RE0000837101; PAu001165939
243	I DON'T KNOW HOW TO LOVE HIM	Universal Music Corp.	EU0000219295; RE0000778056
244	I GET AROUND	Universal Music Corp.	EU0000821071; RE0000574324; PAu002079503
245	I HATE MYSELF FOR LOVING YOU	Songs of Universal, Inc.; Polygram Publishing, Inc.	PA0000391570; PA0000419420; PAu001029900
246	I LOVE THE WAY YOU LOVE ME	Universal Music - MGB NA LLC	PAu001650145; PA0000713657
247	I MISS YOU	Universal Music Corp.	PA0001243932
248	I NEED YOU	Capitol CMG, Inc.	PA0000991416
249	I STAND ALONE	Universal Music Corp.	PA0001227288; PA0001212305
250	I WANT CRAZY	Songs of Universal, Inc.	PA0001856536
251	I WILL BE HERE	Capitol CMG, Inc.; Universal Music - Z Tunes LLC	PA0000454569
252	I WILL RISE	Capitol CMG, Inc.	PA0001623041
253	I WILL SURVIVE	Polygram Publishing, Inc.	PAu000047934; PAu000129011; PA0000041104
254	I WILL WAIT	Polygram Publishing, Inc.	PA0001818830
255	I WON'T DANCE	Polygram Publishing, Inc.	EP0000046848; R00000291379; R00000291158
256	I'LL NEVER BREAK YOUR HEART	Universal Music - Z Tunes LLC	PA0000859260; PA0000949897
257	I'LL NEVER SMILE AGAIN	Universal Music Corp.	EU0000202771; R00000392686
258	I'M A BELIEVER	Songs of Universal, Inc.	EP0000229124; RE0000653597; EU0000968474; RE0000653692
259	I'M N LUV (WIT A STRIPPER) FEATURING MIKE JONES	Universal Music - Z Tunes LLC	PA0001396315
260	IF I EVER LOSE MY FAITH IN YOU	Songs of Universal, Inc.	PA0000618388; PA0001038452
261	IF YOU LEAVE ME NOW	Universal Music - MGB NA LLC	EU0000694744; RE0000904428
262	IN MY PLACE	Universal Music - MGB NA LLC	PA0001073301
263	IN THE END	Universal Music - Z Tunes LLC	PA0001092513
264	INBETWEEN DAYS	Universal Music - MGB NA LLC	PA0000279383
265	INDESCRIBABLE	Capitol CMG, Inc.	PA0001299529
266	IRIDESCENT	Universal Music - Z Tunes LLC	PA0001725626
267	IT'S ALL COMING BACK TO ME NOW	Polygram Publishing, Inc.	PAu001953216; PA0000787517
268	IT'S ALL OVER NOW, BABY BLUE	Songs of Universal, Inc.	EU0000874587; RE0000647437; EP0000202991; RE0000647469
269	IT'S ALRIGHT, MA (I'M ONLY BLEEDING)	Songs of Universal, Inc.	EU0000874591; RE0000647441; EP0000202990; RE0000647468; EP0000223904; RE0000684773
270	IT'S TIME	Songs of Universal, Inc.	PA0001796482
271	JESUS MESSIAH	Capitol CMG, Inc.	PA0001623039
272	JOKERMAN	Songs of Universal, Inc.	PAu000531924; PA0000191286
273	JOY TO THE WORLD	Universal Music Corp.	EU0000218428; RE0000775044; EP0000284915; RE0000643916

	Title	Plaintiff	Registration No.
274	JUST LIKE A WOMAN	Songs of Universal, Inc.	EU0000930913; RE0000684782; EP0000221661; RE0000684766
275	JUST LIKE HEAVEN	Universal Music - MGB NA LLC	PA0000344486
276	JUST LIKE TOM THUMB'S BLUES	Songs of Universal, Inc.	EU0000903129; RE0000647445
277	JUST ONE LOOK	Universal Music - MGB NA LLC	EU0000761806; RE0000530731
278	KID CHARLEMAGNE	Universal Music Corp.	EU0000679291; RE0000891480
279	KING OF PAIN	Songs of Universal, Inc.	PA0000201653; PA0001038431
280	KINGS AND QUEENS	Universal Music - Z Tunes LLC	PA0002076506
281	KRYPTONITE	Songs of Universal, Inc.	PA0000999801
282	LAMB OF GOD	Capitol CMG, Inc.	PA0000296457
283	LATCH	Polygram Publishing, Inc.	PA0001916095
284	LEAN ON ME	Songs of Universal, Inc.	EP0000304954; RE0000832582
285	LEAVE OUT ALL THE REST	Universal Music - Z Tunes LLC	PA0001167571
286	LET YOU DOWN	Capitol CMG, Inc.	PA0002222190
287	LET'S FACE THE MUSIC AND DANCE	Universal Music Corp.	EU0000105690; R00000301275; EP0000052756; R00000313962
288	LET'S GET TOGETHER	Universal Music Corp.	EU0000778381; RE0000518243
289	LET'S STAY TOGETHER	Universal Music Corp.	EU0000287623; RE0000799562
290	LETTERS FROM HOME	Universal Music - MGB NA LLC	PA0001159374; PA0001160515; PA0001166509
291	LIFE IS A HIGHWAY	Universal Music Corp.	PA0000683569
292	LIGHTNING CRASHES	Universal Music - MGB NA LLC	PA0000720664
293	LIKE A ROLLING STONE	Songs of Universal, Inc.	EP0000205564; RE0000640124
294	LITTLE DEUCE COUPE	Universal Music Corp.; Universal Music - MGB NA LLC	EU0000783375; RE0000575772; EU0000783375; RE0000575773; EU0000783375; RE0000525573
295	LITTLE LIES	Universal Music - MGB NA LLC	PA0000332449; PA0000391430
296	LITTLE LION MAN	Polygram Publishing, Inc.	PA0001932483
297	LONG COOL WOMAN IN A BLACK DRESS	Polygram Publishing, Inc.	EU0000349588; RE0000825602
298	LORD, I NEED YOU	Capitol CMG, Inc.	PA0001734765
299	LOVE IS ALL AROUND	Polygram Publishing, Inc.	EFO000124632; RE0000698430
300	LOVE MINUS ZERO/NO LIMIT	Songs of Universal, Inc.	EU0000874590; RE0000647440; EP0000202992; RE0000647470
301	LOVESONG	Universal Music - MGB NA LLC	PA0001073355
302	LUCKENBACH TEXAS (BACK TO THE BASICS OF LOVE)	Polygram Publishing, Inc.	EP0000367087; RE0000909980
303	LYING FROM YOU	Universal Music - Z Tunes LLC	PA0001256415
304	MACARTHUR PARK	Polygram Publishing, Inc.	EU0000049691; RE0000723251;
305	MAD	Universal Music - Z Tunes LLC	PA0001395687
306	MAGIC	Universal Music - MGB NA LLC	PA0001916029
307	MAGIC CARPET RIDE	Songs of Universal, Inc.	EU0000083717; RE0000730472
308	MASTERS OF WAR	Songs of Universal, Inc.	EU0000765995; RE0000529553; EP0000178108; RE0000529581
309	MEANT TO LIVE	Capitol CMG, Inc.	PA0001227016
310	MERRY CHRISTMAS DARLING	Universal Music Corp.	EP0000281386; RE0000774636; PA0000856789
311	MESSAGE IN A BOTTLE	Songs of Universal, Inc.	PA0000069032
312	MIDNIGHT	Universal Music - MGB NA LLC	PA0001916020

	Title	Plaintiff	Registration No.
313	MIDNIGHT TRAIN TO GEORGIA	Polygram Publishing, Inc.	EU0000287454; RE0000802289; EP0000311363; RE0000835032
314	MILKSHAKE	Universal Music - MGB NA LLC	PA0001158349; PA0001158583
315	MISERY	Universal Music - MGB NA LLC	PA0001726265
316	MISS INDEPENDENT	Universal Music - Z Tunes LLC	PA0001395688
317	MONA LISAS AND MAD HATTERS	Polygram Publishing, Inc.	EF0000157243; RE0000822534
318	MONDAY MONDAY	Universal Music Corp.	EU0000922884; RE0000705550; EP0000220921; RE0000705546
319	MOONLIGHT IN VERMONT	Universal Music Corp.	EU0000395533; R00000515635
320	MOVE ALONG	Universal Music - MGB NA LLC	PA0001203496
321	MR. TAMBOURINE MAN	Songs of Universal, Inc.	EP0000202671; RE0000647466; EU0000848210; RE0000588389
322	MY BACK PAGES	Songs of Universal, Inc.	EU0000848264; RE0000588408; EP0000195713; RE0000588391
323	MY BEST FRIEND	Universal Music - MGB NA LLC	PA0000964541
324	MY DECEMBER	Universal Music - Z Tunes LLC	PA0001054030
325	MY OLD SCHOOL	Universal Music Corp.	EU0000416546; RE0000837422
326	NEVER BE ALONE	Songs of Universal, Inc.; Universal Music Corp.	PA0001984359
327	NEVER BEEN TO SPAIN	Universal Music Corp.	EU0000218427; RE0000775043
328	NEW DIVIDE	Universal Music - Z Tunes LLC	PA0001677173
329	NEXT TO ME	Songs of Universal, Inc.	PA0002396886
330	NO AIR	Universal Music - MGB NA LLC; Universal Music Corp.	PA0001653567
331	NO DIGGITY	Universal Music - Z Tunes LLC	PA0000839312
332	NO LIGHT, NO LIGHT	Polygram Publishing, Inc.	PA0001777616
333	NO MORE SORROW	Universal Music - Z Tunes LLC	PA0001602921; PA0001167576
334	NO ONE	Universal Music Corp.	PA0001590102
335	NOBODY'S LISTENING	Universal Music - Z Tunes LLC	PA0001256420
336	NOT DARK YET	Songs of Universal, Inc.	PAu002179480
337	NOTHING FROM NOTHING	Universal Music Corp.	EU0000510833; RE0000855515; PAu002434356
338	NUMB	Universal Music - Z Tunes LLC	PA0001256412
339	OCEAN AVENUE	Universal Music - MGB NA LLC	PA0001158187
340	ON TOP OF THE WORLD	Songs of Universal, Inc.	PA0001796480
341	ONE DAY I'LL FLY AWAY	Universal Music Corp.	PA0000081908
342	ONE STEP CLOSER	Universal Music - Z Tunes LLC	PA0001092507; PA0001237305
343	ONE TIN SOLDIER	Songs of Universal, Inc.	EU0000128013; RE0000755132
344	ONE TOKE OVER THE LINE	Universal Music - MGB NA LLC	EU0000201193; RE0000780432
345	ONLY HOPE	Capitol CMG, Inc.	PA0000943389
346	OPEN YOUR EYES	Polygram Publishing, Inc.	PA0001990273
347	OUR DAY WILL COME	Universal Music Corp.	EU0000751240; RE0000502027; RE0000463672
348	OUR GOD	Capitol CMG, Inc.	PA0001730879
349	OUR LIPS ARE SEALED	Universal Music - MGB NA LLC	PAu000299968; PA0000123694
350	PAPERCUT	Universal Music - Z Tunes LLC	PA0001092506
351	PARADISE	Universal Music - MGB NA LLC	PA0001766985
352	PARENTS JUST DON'T UNDERSTAND	Universal Music - Z Tunes LLC	PA0000381782
353	PEOPLE NEED THE LORD	Capitol CMG, Inc.	PA0000212604

	Title	Plaintiff	Registration No.
354	POINTS OF AUTHORITY	Universal Music - Z Tunes LLC	PA0001092509
355	POISON	Songs of Universal, Inc.; Polygram Publishing, Inc.	PA0000472703; PA0000445681
356	POSITIVELY 4TH STREET	Songs of Universal, Inc.	EU0000903133; RE0000647449
357	POSSUM KINGDOM	Songs of Universal, Inc.	PA0000730720
358	POWERLESS	Universal Music - Z Tunes LLC	PA0001805751
359	PRAISE YOU	Polygram Publishing, Inc.	PA0000968847
360	PRETTY GIRL ROCK	Universal Music - Z Tunes LLC	PA0001784138
361	PUTTIN' ON THE RITZ	Universal Music Corp.	E0000696554; R00000155144; EP0000011281; R00000183130
362	RADIOACTIVE	Songs of Universal, Inc.	PA0001796477
363	RAINY DAYS AND MONDAYS	Universal Music Corp.	EU0000222638; RE0000775443; PAu002237895; EP0000300297; PA0000864726
364	RED, RED WINE	Songs of Universal, Inc.	RE0000653689
365	REDBONE	Songs of Universal, Inc.; Universal Music Corp.	PA0002063056; PA0002082553
366	REELING IN THE YEARS	Universal Music Corp.	EU0000353008; RE0000823112
367	REMEMBER THE NAME	Universal Music - Z Tunes LLC	PA0001163444
368	REMEMBERING SUNDAY	Songs of Universal, Inc.	PA0001675980
369	RENEGADES	Songs of Universal, Inc.	PA0001995174
370	REUNITED	Polygram Publishing, Inc.	PAu000023138; PA0000039131
371	RIDE LIKE THE WIND	Universal Music - MGB NA LLC	PA0000071337
372	RIKKI DON'T LOSE THAT NUMBER	Universal Music Corp.	EU0000469054; RE0000854814
373	ROCKY MOUNTAIN WAY	Songs of Universal, Inc.	EU0000416549; RE0000837425
374	ROXANNE	Songs of Universal, Inc.	PA0000052671
375	RUN	Polygram Publishing, Inc.	PA0001994133
376	RUNAWAY	Universal Music - Z Tunes LLC	PA0001092511
377	RUNAWAY	Polygram Publishing, Inc.	PA0000707154
378	RUSSIAN ROULETTE	Universal Music - Z Tunes LLC	PA0001704500
379	SAD	Universal Music - MGB NA LLC	PA0001810801
380	SAILING	Universal Music - MGB NA LLC	PA0000071338
381	SAN FRANCISCO BE SURE TO WEAR FLOWERS IN YOUR HAIR	Universal Music Corp.	EU0000995820; RE0000687597
382	SANTERIA	Songs of Universal, Inc.	PA0000813737
383	SAY SOMETHING	Songs of Universal, Inc.	PA0001846423; PA0001397885
384	SCARS TO YOUR BEAUTIFUL	Songs of Universal, Inc.	PA0002100489
385	SECRET	Universal Music - MGB NA LLC	PA0001073092
386	SHAMBALA	Songs of Universal, Inc.	EU0000398898; RE0000836928
387	SHAPE OF MY HEART	Songs of Universal, Inc.	PA0000618387; PA0001038451
388	SHE BELIEVES IN ME	Polygram Publishing, Inc.	EP0000368480; RE0000909991; PA0000066693
389	SHE BELONGS TO ME	Songs of Universal, Inc.	EU0000874585; RE0000647435; EP0000202996; RE0000647474
390	SHE WILL BE LOVED	Universal Music - MGB NA LLC	PA0001073087
391	SHELTER FROM THE STORM	Songs of Universal, Inc.	EU0000530721; RE0000862517
392	SHIVER	Universal Music - MGB NA LLC	PA0000981357
393	SIMPLE MAN	Songs of Universal, Inc.	EU0000448563; RE0000844239; RE0000851734

	Title	Plaintiff	Registration No.
394	SIMPLE TWIST OF FATE	Songs of Universal, Inc.	EU0000530720; RE0000862516
395	SMOKE GETS IN YOUR EYES	Polygram Publishing, Inc.	EP0000039116; R00000265488; R0000026554
396	SO SICK	Universal Music - Z Tunes LLC	PA0001163977
397	SOLITARY MAN	Songs of Universal, Inc.	PA0000042999; EP0000215760; RE0000653594
398	SOMEBODY TO LOVE	Universal Music Corp.	EU0000922524; RE0000846415; EP0000228384; RE0000654121
399	SOMETHING JUST LIKE THIS	Universal Music - MGB NA LLC	PA0002083153
400	SOMEWHERE I BELONG	Universal Music - Z Tunes LLC	PA0001256410
401	SOMEWHERE ONLY WE KNOW	Universal Music - MGB NA LLC	PA0001160739
402	SONG SUNG BLUE	Songs of Universal, Inc.	EU0000322568; RE0000813919
403	SONGBIRD	Universal Music - MGB NA LLC	A00000885251; EU0000772678
404	SOUL MAN	Universal Music Corp.	EU0000016237; RE0000688918
405	SOUND OF DA POLICE	Universal Music - Z Tunes LLC	PA0000711682
406	SPIRITS IN THE MATERIAL WORLD	Songs of Universal, Inc.	PA0000128668
407	STEP INTO CHRISTMAS	Polygram Publishing, Inc.	EP0000319570; RE0000836136; EFO000167890; RE0000838135
408	STRAWBERRY WINE	Songs of Universal, Inc.; Universal Music - Z Tunes LLC	PA0000840407
409	SUBTERRANEAN HOMESICK BLUES	Songs of Universal, Inc.	EU0000874584; RE0000647434; EP0000201208; RE0000647465
410	SUCKER FOR PAIN	Songs of Universal, Inc.	PA0002076970; PA0002078398
411	SUGAR MAN	Songs of Universal, Inc.	EU0000133445; RE0000767053
412	SUMMER WINE	Universal Music Corp.	EU0000951758; RE0000640586
413	SUNDAY MORNING	Universal Music - MGB NA LLC	PA0001073091
414	SWEET CAROLINE	Songs of Universal, Inc.	EU0000121797; RE0000748767; PA0000043001
415	SWEET CREATURE	Polygram Publishing, Inc.	PA0002087493
416	SWEET HOME ALABAMA	Songs of Universal, Inc.; Universal Music Corp.	EU0000511375; RE0000862377; EU0000511375; RE0000857056
417	SWING, SWING	Universal Music - MGB NA LLC	PA0001203496
418	SYNCHRONICITY II	Songs of Universal, Inc.	PA0000201651; PA0001038429
419	TAKE A BOW	Universal Music - Z Tunes LLC	PA0001692696
420	TAKE ME OUT	Polygram Publishing, Inc.	PA0001233512
421	TALK	Universal Music - MGB NA LLC	PA0001700311
422	TALK	Polygram Publishing, Inc.	PA0002190909
423	TANGLED UP IN BLUE	Songs of Universal, Inc.	EU0000529117; RE0000862509
424	TEARDROP	Polygram Publishing, Inc.	PA0000926996
425	TENNESSEE WHISKEY	Polygram Publishing, Inc.	PAu000307891; PA0000148061; PA0000211136
426	THAT SMELL	Songs of Universal, Inc.	EU0000842824; RE0000910305; PA0000111507
427	THE BAD TOUCH	Polygram Publishing, Inc.	PA0001049232
428	THE BOYS ARE BACK IN TOWN	Polygram Publishing, Inc.	EU0000674600; RE0000891463
429	THE CATALYST	Universal Music - Z Tunes LLC	PA0001725628
430	THE CAVE	Polygram Publishing, Inc.	PA0001932476
431	THE CHANGE	Universal Music Corp.	PA0000774761; PA0000776742
432	THE DEVIL WENT DOWN TO GEORGIA	Songs of Universal, Inc.	PAu000084340

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433	THE GRAND ILLUSION	Universal Music Corp.	EU0000828643; RE0000910692
434	THE HARDER THEY COME	Polygram Publishing, Inc.	EU0000388670
435	THE KEEPER OF THE STARS	Polygram Publishing, Inc.	PA0000692567; PA0000713749; PAu001898849
436	THE KILL	Universal Music - Z Tunes LLC	PA0001630065
437	THE KING OF CARROT FLOWERS PART ONE	Universal Music - MGB NA LLC	PA0000928784
438	THE LOGICAL SONG	Universal Music Corp.	PA0000032060
439	THE LONG BLACK VEIL	Polygram Publishing, Inc.	EU0000577749; RE0000346323
440	THE SAFETY DANCE	Songs of Universal, Inc.; Polygram Publishing, Inc.	PA0000413304; PA0000444999
441	THE SAGA BEGINS	Songs of Universal, Inc.	PA0000995641
442	THE SALTWATER ROOM	Universal Music Corp.	PA0001649308
443	THE SCIENTIST	Universal Music - MGB NA LLC	PA0001073303
444	THE TIMES THEY ARE A-CHANGIN'	Songs of Universal, Inc.	EU0000798069; RE0000529575; EP0000196321; RE0000588437
445	THE TROUBLE WITH LOVE IS	Songs of Universal, Inc.	PA0001227298
446	THE WEIGHT	Songs of Universal, Inc.	EU0000049518; RE0000739082; EP0000258882; RE0000739062
447	THE WORLD'S GREATEST	Universal Music - Z Tunes LLC	PA0001084039
448	THEME FROM SHAFT	Universal Music Corp.	EU0000259390; RE0000796884; RE0000801338
449	THESE BOOTS ARE MADE FOR WALKIN'	Universal Music Corp.	EU0000915461; RE0000612396
450	THIRTEEN	Universal Music Corp.	EU0000328421; RE0000816224
451	THIS IS WAR	Universal Music - Z Tunes LLC	PA0002076510
452	THIS LOVE	Universal Music - MGB NA LLC	PA0001073085
453	THUNDER	Songs of Universal, Inc.; Universal Music Corp.	PA0002113702
454	TINY DANCER	Polygram Publishing, Inc.	EU0000283994; RE0000802431
455	TO MAKE YOU FEEL MY LOVE	Songs of Universal, Inc.	PAu002178281
456	TOO CLOSE	Polygram Publishing, Inc.	PA0001806290
457	TOP OF THE WORLD	Universal Music Corp.	EU0000329403; RE0000817022; PAu002215502
458	TORN	Universal Music - MGB NA LLC; Polygram Publishing, Inc.	PA0000836968; PA0000705322
459	TRAPPED IN THE CLOSET (PART 1)	Universal Music - Z Tunes LLC	PA0001395840
460	UNFAITHFUL	Universal Music - Z Tunes LLC	PA0001164749
461	UNINVITED	Universal Music Corp.	PA0000921947
462	VANILLA TWILIGHT	Universal Music Corp.	PA0001692986
463	VINCENT (STARRY, STARRY NIGHT)	Songs of Universal, Inc.	EU0000284302; RE0000803733
464	VIOLET HILL	Universal Music - MGB NA LLC	PA0001820463
465	VISIONS OF JOHANNA	Songs of Universal, Inc.	EU0000930909; RE0000685898; EP0000221660; RE0000685899; EU0000928301; RE0000684775
466	VIVA LA VIDA	Universal Music - MGB NA LLC	PA0001820459
467	VOODOO	Universal Music Corp.	PA0000940225
468	WALK THE DINOSAUR	Universal Music Corp.	PA0000415228
469	WALKING ON THE MOON	Songs of Universal, Inc.	PA0000069037
470	WANTED	Songs of Universal, Inc.	PA0001777909

	Title	Plaintiff	Registration No.
471	WARRIOR	Songs of Universal, Inc.	PA0002375231
472	WE GOT THE BEAT	Universal Music - MGB NA LLC	PA0000123699; PA0000127864
473	WE'RE NOT GONNA TAKE IT	Songs of Universal, Inc.	PA0000226789
474	WE'VE ONLY JUST BEGUN	Universal Music Corp.	EU0000169722; RE0000775608
475	WHAT I'VE DONE	Universal Music - Z Tunes LLC	PA0001167574; PA0001602911; PA0001708260
476	WHEN I'M GONE	Songs of Universal, Inc.	PAu002577919; PA0001120566
477	WHITE BLANK PAGE	Polygram Publishing, Inc.	PA0001932481
478	WHITE CHRISTMAS	Universal Music Corp.	EU0000238624; R00000435930; EP0000104340; R00000464105
479	WHO WE ARE	Songs of Universal, Inc.	PA0001934683
480	WHOM SHALL I FEAR (GOD OF ANGEL ARMIES)	Capitol CMG, Inc.	PA0001830592
481	WICHITA LINEMAN	Polygram Publishing, Inc.	EU0000073735; RE0000732681
482	WILL IT GO ROUND IN CIRCLES	Universal Music Corp.	EU0000383670; RE0000836544
483	WINDY	Universal Music Corp.	EU0000989067; RE0000687658; EP0000232781; RE0000687939
484	WITH YOU	Universal Music - Z Tunes LLC	PA0001092508
485	WORDS I NEVER SAID	Songs of Universal, Inc.; Universal Music - Z Tunes LLC; Universal Music - MGB NA LLC	PA0001739113
486	WOULDN'T IT BE NICE	Universal Music Corp.	EU0000948191; PAu002079501; RE0000662433
487	WRAPPED AROUND YOUR FINGER	Songs of Universal, Inc.	PA0000201655; PA0001038433; PA0000201654; PA0001038432
488	YELLOW	Universal Music - MGB NA LLC	PA0000981360
489	YESTERDAY ONCE MORE	Universal Music Corp.	EU0000401698; RE0000872358; PAu002215503
490	YOU AIN'T GOIN' NOWHERE	Songs of Universal, Inc.	EU0000018767; RE0000701195
491	YOU ARE NOT ALONE	Universal Music - Z Tunes LLC	PA0000789976
492	YOU ARE SO BEAUTIFUL	Universal Music Corp.	EU0000408125; RE0000837480
493	YOU CAN GET IT IF YOU REALLY WANT	Polygram Publishing, Inc.	EU0000212983; RE0000778661
494	YOU LIGHT UP MY LIFE	Polygram Publishing, Inc.	EU0000676281; RE0000891470; EP0000380330; RE0000910478
495	YOU LOOK SO GOOD IN LOVE	Universal Music Corp.; Polygram Publishing, Inc.	PAu000502409
496	YOU MAKE LOVIN FUN	Universal Music - MGB NA LLC	EU0000713071; RE0000904498; PA0001162955
497	YOU'RE MY BEST FRIEND	Polygram Publishing, Inc.	EP0000336092; RE0000875578
498	YOU'RE THE INSPIRATION	Universal Music - MGB NA LLC	PA0000213889; PAu000638574; PAu000598698
499	YOUR GUARDIAN ANGEL	Songs of Universal, Inc.	PA0001376464
500	YOUR SONG	Polygram Publishing, Inc.	EFO000142515; RE0000759790; EU0000183663; RE0000779459