

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

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

Plaintiffs,

vs.

SUNO, INC. and JOHN DOES 1-10,

Defendant.

Civil Action No. 1:24-cv-11611 (FDS)

**DECLARATION OF RAJAN S. TREHAN IN SUPPORT OF PLAINTIFFS' MOTION
FOR LEAVE TO AMEND COMPLAINT**

I, Rajan S. Trehan, declare as follows:

1. I am an attorney, duly licensed to practice law in California, and Partner at the law firm Hueston Hennigan LLP. I am counsel of record for Plaintiffs in the above-captioned matter. I submit this Declaration in support of Plaintiffs' Motion for Leave to Amend the Complaint. I have personal knowledge of the facts set forth in this declaration, and if called as a witness, I could and would testify competently to such facts under oath.

2. Attached hereto as Exhibit A is a copy of Plaintiffs' Proposed Amended Complaint.

3. Attached hereto as Exhibit B is a blackline comparison between Plaintiffs' Proposed Amended Complaint and their original Complaint.

4. Attached hereto as Exhibit C is a true and correct copy of Plaintiffs' First Set of Interrogatories to Defendant Suno, Inc., dated August 19, 2024.

5. Attached hereto as Exhibit D is a true and correct copy of Defendant Suno, Inc.'s Responses and Objections to Plaintiffs' First Set of Interrogatories, dated September 18, 2024.

6. Attached hereto as Exhibit E is a true and correct copy of Defendant Suno, Inc.'s Second Amended Responses and Objections to Plaintiffs' First Set of Interrogatories (Nos. 2, 3, and 5), dated January 31, 2025.

7. Attached hereto as Exhibit F is a true and correct copy of Defendant Suno, Inc.'s First Supplemental Responses and Objections to Plaintiffs' First Set of Interrogatories (Nos. 1, 2, 3, 5, and 6), dated May 20, 2025.

8. Attached hereto as Exhibit G is a true and correct copy of Plaintiffs' Second Set of Interrogatories to Defendant Suno, Inc., dated April 24, 2025.

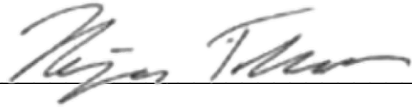
9. Attached hereto as Exhibit H is a true and correct copy of Defendant Suno, Inc.'s Responses and Objections to Plaintiffs' Second Set of Interrogatories, dated May 27, 2025.

10. Attached hereto as Exhibit I is an email chain dated September 15, 2025 between Mariah Rivera (Hueston Hennigan) and Britt Lovejoy (Latham & Watkins).

11. Attached as Exhibit J is an email chain dated September 11, 2025 between Mariah Rivera (Hueston Hennigan) and Britt Lovejoy (Latham & Watkins).

I declare under penalty of perjury that the foregoing is true and correct.

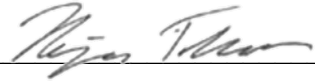
Executed on this 8th day of October, 2025, in Los Angeles, California.

A handwritten signature in dark ink, appearing to read "Rajan Trehan", is written over a horizontal line.

Rajan S. Trehan

CERTIFICATE OF SERVICE

I hereby certify that this document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those identified as non-registered participants on October 8, 2025.

A handwritten signature in black ink, appearing to read "Rajan Trehan", is written over a horizontal line.

Rajan S. Trehan

Counsel for Plaintiffs