

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ANTHONY JUSTICE and 5TH WHEEL
RECORDS, INC. and MY HEARTLAND
PUBLISHING, LLC, each individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

SUNO, INC.,

Defendant.

Civil Action No. 1:25-cv-11739-FDS

ANSWER OF DEFENDANT SUNO, INC. TO FIRST AMENDED COMPLAINT

Defendant Suno, Inc. (“Suno”), by and through its undersigned counsel, hereby answers the First Amended Complaint (the “FAC”), Dkt. 27, filed September 22, 2025 by Plaintiffs Anthony Justice and 5th Wheel Records, Inc. and My Heartland Publishing, LLC (collectively, “Plaintiffs”).

RESPONSES TO SPECIFIC ALLEGATIONS

INTRODUCTION¹

1. Suno admits that Suno, Inc., has its principal place of business in Massachusetts. Suno further admits that its generative AI tool allows users to generate, among other things, digital music files in response to basic inputs. Suno further admits that its model was constructed by showing the program a vast amount of different kinds of sound recordings in order to derive statistical insights about those recordings. To the extent the allegations in this paragraph contain

¹ The various headings and subheadings of the First Amended Complaint are not allegations and thus do not require a response. Suno reproduces them in this Answer solely for convenience. To the extent a response is required, Suno denies any allegations contained in the headings and subheadings of the First Amended Complaint.

legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

2. Suno admits that on June 24, 2024, UMG Recordings, Inc., Sony Music Entertainment, and Warner Music International Services Limited, among other plaintiffs, filed a complaint against Suno alleging copyright infringement. To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself.

3. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

4. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

5. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

6. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

7. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

8. Suno denies the allegations in this paragraph.

9. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding ownership, and on that basis denies them. Suno otherwise denies the allegations in this paragraph.

10. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

11. Suno admits it obtained audio data from YouTube for use as training data. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

12. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

13. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations.

14. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations.

15. Suno admits that it has asserted a fair use defense in the lawsuit referenced in paragraph 2, *supra*. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations.

16. Suno admits that it has asserted a fair use defense in the lawsuit referenced in paragraph 2, *supra*. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations.

17. Suno admits that it has asserted a fair use defense in the lawsuit referenced in paragraph 2, *supra*. Suno further admits that the plaintiffs in that lawsuit assert only a single claim of copyright infringement. To the extent the allegations in this paragraph contain legal

conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

18. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

19. Suno denies that the U.S. Copyright Office is “the most relevant and influential agency in the United States concerning all things copyright.” Suno admits that the U.S. Copyright Office has published materials addressing copyright and artificial intelligence. Suno denies the remaining allegations and characterizations in this paragraph.

20. Suno admits that in May of 2025, the U.S. Copyright Office published a document entitled *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)*.

21. The allegations in this paragraph purport to characterize the contents of a publicly available document, which speaks for itself. Suno denies the allegations in this paragraph to the extent they mischaracterize, selectively quote, or draw legal conclusions from that document.

22. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

23. The allegations in this paragraph consist of characterizations, arguments, and a quotation attributed to a spokesperson for the Recording Industry Association of America, to which no response is required. To the extent a response is required, Suno denies the allegations in this paragraph.

24. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

25. Suno admits that constructing its generative AI tool required showing the program massive amounts of data in order to derive statistical insights about that data. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations.

26. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

27. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

28. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

29. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

30. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

31. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph concerning the licensing practices of Plaintiffs, the purported

class, and the purported subclasses, and on that basis denies them. Suno denies the remaining allegations in this paragraph.

32. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

33. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph concerning the licensing practices of Plaintiffs, the purported class, and the purported subclasses, and on that basis denies them.

34. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

35. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

36. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

37. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

38. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

39. Suno admits it obtained audio data from YouTube for use as training data. Suno admits that it has not publicly disclosed the contents of its training data, which Suno regards as highly confidential, commercially sensitive information. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

40. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

41. Suno admits that constructing its generative AI tool required showing the program massive amounts of data in order to derive statistical insights about that data. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

42. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

43. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

44. Suno admits that “sample” is a term sometimes used to refer to using a portion of an existing song or sound recording in a new song or sound recording. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

45. Suno admits that it has stated publicly that its service is designed to create new music and that it has implemented guardrails to prevent the model from generating music that

replicates existing music. To the extent the remaining allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

46. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

47. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

48. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

49. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

50. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies that its model is

designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

51. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

52. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

53. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

54. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

55. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

56. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

57. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

58. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

59. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

60. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

61. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

62. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in

this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

63. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

64. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

65. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

66. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

67. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

68. Suno admits that its generative AI tool allows users to generate, among other things, digital music files in response to basic inputs.

69. Suno admits that it charges many of its users monthly fees to use its product and produce digital files. Suno admits that its products include both a web and a mobile application. Suno admits that its generative AI tool allows users to generate, among other things, digital music files in response to basic inputs. Suno denies the remaining allegations in this paragraph.

70. Suno admits that over 12,000,000 users have generated music files using its product. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

71. Suno admits that it has not publicly disclosed the contents of its training data, which Suno regards as highly confidential, commercially sensitive information. Suno admits that its model was constructed by showing the program massive amounts of data in order to derive statistical insights about that data. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

72. Suno admits that its model is a type of computer program known as a “neural network,” which was constructed by showing the program tens of millions of instances of different kinds of recordings gathered from publicly available sources. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

73. Suno admits that it obtained audio data from YouTube for use as training data. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

74. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

75. Suno admits that it obtained audio data from Jamendo for use as training data. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

76. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

77. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

78. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno otherwise lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

79. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

80. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

81. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

82. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

83. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

84. Suno admits that its model was constructed by showing the program massive amounts of data in order to derive statistical insights about that data. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

85. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

86. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

87. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in

this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

88. Suno admits it has previously been valued at \$500,000,000. Suno admits that it offers a subscription plan, “Premier,” available for up to \$30 per month.

89. Suno admits that its model was constructed by showing the program a vast amount of different kinds of sound recordings in order to derive statistical insights about those recordings. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

90. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

91. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

92. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

93. Suno admits that its model was constructed by showing the program a vast amount of different kinds of sound recordings in order to derive statistical insights about those recordings. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. The allegations in this paragraph otherwise contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

94. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. The allegations in this paragraph otherwise

contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

95. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

96. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

97. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

98. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

99. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno lacks knowledge or information sufficient

to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

100. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

THE PARTIES

101. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

102. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

103. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

104. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

105. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

106. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

107. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

108. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

109. Suno admits that Suno, Inc. is a Delaware corporation with its current principal place of business at 17 Dunster Street, Cambridge, Massachusetts 02138.

JURISDICTION AND VENUE

110. For purposes of this action, Suno does not contest subject matter jurisdiction, except with respect to Suno's Twelfth Affirmative Defense (Lack of Article III Standing) and Thirteenth Affirmative Defense (Lack of Statutory Standing). The paragraph otherwise contains legal conclusions to which no response is required.

111. For purposes of this action, Suno does not contest personal jurisdiction. The paragraph otherwise contains legal conclusions to which no response is required.

112. For purposes of this action, Suno does not contest venue. The paragraph otherwise contains legal conclusions to which no response is required.

FACTUAL BACKGROUND

113. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

114. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

115. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

116. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

117. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

118. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

119. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

120. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

121. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

122. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

123. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

124. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

125. Suno admits that its model was constructed by showing the program a vast amount of different kinds of sound recordings in order to derive statistical insights about those recordings. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

126. Suno admits it launched its music-generative service in 2023.

127. Suno admits that its generative AI tool allows users to generate, among other things, digital music files in response to basic inputs.

128. Suno admits the quoted language appears in a Discord post by Suno co-founder Georg Kucsko. To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself.

129. Suno admits the quoted language appears in Rachel Metz, *The AI Music Era Is Here. Not Everyone Is a Fan*, Bloomberg (May 6, 2024). To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself.

130. Suno admits that its model is a type of computer program known as a “neural network,” which was constructed by showing the program a vast amount of different kinds of sound recordings in order to derive statistical insights about those recordings. To the extent the

allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

131. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

132. Suno admits the quoted language appears in Brian Hiatt, *A ChatGPT for Music Is Here. Inside Suno, the Startup Changing Everything*, Rolling Stone (Mar. 17, 2024), available at <https://www.rollingstone.com/music/music-features/suno-ai-chatgpt-for-music-1234982307/>. To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself.

133. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

134. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph concerning Plaintiffs, members of the putative class, and members of the putative subclass, and on that basis denies them. Suno denies the remaining allegations in this paragraph.

135. Suno admits that its model was constructed by showing the program a vast amount of different kinds of sound recordings in order to derive statistical insights about those recordings. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

136. Suno admits the quoted language appears in Daniel Tencer, *Suno Could Get Sued by the Record Business. Who's Backing It With \$125M?*, Music Business Worldwide (May 28, 2024), available at <https://www.musicbusinessworldwide.com/suno-could-get-sued-by-the-record-business-whos-backing-it-with-125m/>. To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself. Suno denies the remaining allegations in this paragraph.

137. Suno admits that its model was constructed by showing the program a vast amount of different kinds of sound recordings in order to derive statistical insights about those recordings. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

138. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

139. Suno admits that its model was constructed by showing the program a vast amount of different kinds of sound recordings in order to derive statistical insights about those recordings. Suno admits the quoted language appears in Suno's original Answer in the action referenced in paragraph 2, *supra*. To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself. Suno denies that its Answer in that action, which was filed by different plaintiffs, referred to sound recordings whose rights are purportedly owned by plaintiffs in this action.

140. Suno admits the quoted language appears in Suno's original Answer in the action referenced in paragraph 2, *supra*. To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself.

141. Suno admits the quoted language appears in Suno's original Answer in the action referenced in paragraph 2, *supra*. To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself.

142. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

143. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

144. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding YouTube's purported motives, and on that basis denies them. The remaining allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

145. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

146. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph concerning unidentified music streaming platforms, and on that basis denies them. The remaining allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

147. Suno admits it obtained text from publicly available Internet sources, abiding by paywalls, password protections, and the like, for use as training data. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph concerning unidentified online sources, and on that basis denies them.

148. Suno admits its training data included text descriptions of audio files. Suno denies that it strips any text data from its outputs. To the extent the allegations in this paragraph contain

legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

149. Suno denies the allegations in this paragraph.

150. Suno admits that constructing its generative AI tool required showing the program tens of millions of instances of different kinds of recordings in order to derive statistical insights about them. The remaining allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

151. Suno admits the quoted language appears in U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025). To the extent the allegations in this paragraph purport to summarize or characterize that publicly available document, that document speaks for itself.

152. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

153. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

154. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

155. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

156. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

157. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

158. Suno admits that it offers both free and paid versions of its service. Suno denies any remaining allegations of this paragraph.

159. To the extent the allegations in this paragraph purport to summarize or characterize Suno's Terms of Service, that document speaks for itself. Suno admits that its Terms of Service grant certain rights in outputs to paid-tier subscribers. Suno denies that its Terms of Service permit free or Basic tier users to use outputs for commercial purposes. Suno further denies that any users may use outputs "without restriction," as the Terms of Service contain various conditions and limitations. Suno denies the remaining allegations in this paragraph.

160. Suno denies the allegations in this paragraph.

161. Suno denies the allegations in this paragraph.

162. Suno denies the allegations in this paragraph.

163. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Suno's purported reproduction of distinctive identifiers belonging to Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them. The remaining allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

Specific Allegations as to Each Registered Work in Exhibit A

164. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

165. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

166. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

167. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

168. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

169. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

170. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

171. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

172. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

173. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

174. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

175. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

176. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

177. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

178. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

179. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

180. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

181. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

182. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

183. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

184. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

185. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

186. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

187. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

188. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

189. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

190. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

191. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

192. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

193. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

194. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

195. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

196. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

197. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

198. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

199. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

200. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

201. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

202. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

203. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

204. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

205. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

206. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

207. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

208. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

209. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

210. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

211. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

212. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

213. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

214. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

215. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

216. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

217. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

218. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

219. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

220. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

221. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

222. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

223. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

224. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

225. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

226. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

227. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

228. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

229. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

The United States Copyright Office Report

230. Suno admits that the U.S. Copyright Office released a document entitled *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* in May 2025.

231. Suno admits the quoted language appears at United States Copyright Office, “About,” available at <https://www.copyright.gov/about/>. To the extent the allegations in this paragraph purport to characterize that publicly available website, that website speaks for itself.

232. Suno admits the quoted language appears at United States Copyright Office, “About,” available at <https://www.copyright.gov/about/>. To the extent the allegations in this paragraph purport to characterize that publicly available website, that website speaks for itself.

233. The allegations in this paragraph purport to characterize the contents of a publicly available document, which speaks for itself. Suno denies the allegations in this paragraph to the extent they mischaracterize, selectively quote, or draw legal conclusions from that document. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

234. Suno admits the quoted language appears in U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025). To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself. To the extent the allegations in this paragraph contain

legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

235. Suno admits the quoted language appears in U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025). To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

236. Suno admits the quoted language appears in U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025). To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

237. Suno admits the quoted language appears in U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025). To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

238. Suno admits that its model was constructed by showing the program a vast amount of different kinds of sound recordings in order to derive statistical insights about those recordings. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks

knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

239. Suno admits that its model was constructed by showing the program a vast amount of different kinds of sound recordings in order to derive statistical insights about those recordings. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

240. Suno admits the quoted language appears in U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025). To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

241. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

242. Suno denies that Plaintiffs have identified any purported similarities between Suno outputs and songs purportedly owned by Plaintiffs, members of the putative class, or members of the putative subclass. To the extent the allegations in this paragraph purport to characterize the conclusions of U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025), that publicly-available document speaks for itself.

243. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

244. Suno admits the quoted language appears in U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025). To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

245. To the extent the allegations in this paragraph purport to characterize the conclusions of U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025), that publicly-available document speaks for itself. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

246. To the extent the allegations in this paragraph purport to summarize or characterize the allegations of the complaint referenced in paragraph 2, that publicly-available document speaks for itself.

247. Suno admits the quoted language appears in U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025). To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself.

248. Suno admits the quoted language appears in U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025). To the extent the allegations in this paragraph purport to characterize that publicly available document, that document speaks for itself.

249. To the extent the allegations in this paragraph purport to characterize the conclusions of U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI*

Training (Pre-Publication Version) (May 2025), that publicly-available document speaks for itself.

250. To the extent the allegations in this paragraph purport to characterize the conclusions of U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025), that publicly-available document speaks for itself.

251. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

Suno's Outputs Resemble and Outright Replicate Protected Works

252. Suno admits that its generative AI tool allows users to generate, among other things, digital music files in response to basic inputs. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

253. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

254. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

255. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

256. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno

denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

257. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

258. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

259. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

260. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

261. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

262. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno

denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

263. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

264. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

265. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

266. The allegations in this paragraph purport to characterize the allegations of the complaint referenced in paragraph 2. That publicly available document speaks for itself. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

267. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding specific purported Suno outputs, and on that basis denies them.

268. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

Suno Reproduces Producer Tags & Samples

269. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

270. Suno denies that Plaintiffs have identified any purported similarities between Suno outputs and songs purportedly owned by Plaintiffs, members of the putative class, or members of the putative subclass.

271. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

272. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

273. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

274. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

275. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

276. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

277. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

278. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

279. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

280. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

281. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

282. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

283. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

284. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

285. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

286. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

287. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

288. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

289. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

290. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

291. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

292. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

293. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

294. The allegations in this paragraph purport to characterize the contents of a website. The contents of that website speak for themselves. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

295. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

296. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

297. The allegations in this paragraph purport to characterize the contents of a website. The contents of that website speak for themselves. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

298. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

299. The allegations in this paragraph purport to characterize the contents of a website. The contents of that website speak for themselves. Suno lacks knowledge or information sufficient

to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

300. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

301. The allegations in this paragraph purport to characterize the contents of a website. The contents of that website speak for themselves. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

302. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

303. The allegations in this paragraph purport to characterize the contents of a website. The contents of that website speak for themselves. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

304. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

305. The allegations in this paragraph purport to characterize the contents of a website. The contents of that website speak for themselves. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

306. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

307. The allegations in this paragraph purport to characterize the contents of a website. The contents of that website speak for themselves. Suno lacks knowledge or information sufficient

to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

308. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

309. The allegations in this paragraph purport to characterize the contents of a website. The contents of that website speak for themselves. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

310. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

311. The allegations in this paragraph purport to characterize the contents of a website. The contents of that website speak for themselves. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

312. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

313. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

314. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

315. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

316. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

317. The allegations in this paragraph purport to characterize the contents of a website. The contents of that website speak for themselves. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

318. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

319. The allegations in this paragraph purport to characterize the contents of a website. The contents of that website speak for themselves. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

Suno Creates Soundlike Voices

320. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

321. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

322. The allegations in this paragraph purport to characterize the contents of Blake Brittain, *Music Labels Sue AI Companies Suno, Udio for US Copyright Infringement*, Reuters (June 24, 2024), available at <https://www.reuters.com/technology/artificial-intelligence/music-labels-sue-ai-companies-suno-udio-us-copyright-infringement-2024-06-24/>. The contents of that article speak for themselves. Suno denies that the article mentions Lin-Manuel Miranda. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

323. The allegations in this paragraph purport to characterize the contents of a Reddit post by a purported Suno user. The contents of that post speak for themselves. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

324. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

325. Suno admits the quoted language appears in Michael Mignano, *Interview with Mikey Shulman (Suno CEO)*, at 43:55–44:53, posted on X (Twitter) (Mar. 8, 2024), available at <https://x.com/mignano/status/1766151562299163030>. To the extent the allegations in this paragraph purport to characterize that publicly available video, that video speaks for itself.

326. Suno admits the quoted language appears in Michael Mignano, *Interview with Mikey Shulman (Suno CEO)*, at 43:55–44:53, posted on X (Twitter) (Mar. 8, 2024), available at <https://x.com/mignano/status/1766151562299163030>. To the extent the allegations in this paragraph purport to characterize that publicly available video, that video speaks for itself.

327. To the extent the allegations in this paragraph purport to characterize a video posted on Twitter, that video speaks for itself. Suno denies that Plaintiffs have identified any purported similarities between Suno outputs and songs purportedly owned by Plaintiffs, members of the putative class, or members of the putative subclass.

328. To the extent the allegations in this paragraph purport to characterize a video posted on Twitter, that video speaks for itself. Suno denies that Plaintiffs have identified any purported similarities between Suno outputs and songs purportedly owned by Plaintiffs, members of the putative class, or members of the putative subclass.

329. Suno admits that its generative AI tool allows users to generate, among other things, digital music files in response to basic inputs. Suno denies the remaining allegations in this paragraph.

330. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

331. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

332. Suno admits the quoted language appears in *Sampling Increases Music Sales: An Empirical Copyright Study*, 56 Am. Bus. L.J. 177 (2019), available at <https://ssrn.com/abstract=3226292>. To the extent the allegations in this paragraph purport to characterize that document, that document speaks for itself.

333. Suno denies the allegations in this paragraph.

334. Suno denies that Plaintiffs have identified any purported similarities between Suno outputs and songs purportedly owned by Plaintiffs, members of the putative class, or members of the putative subclass. The remaining allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

The Conduct of Suno's Representative

335. Suno admits that it introduced a Remix feature in May 2025, subject to existing guardrails. Suno denies the remaining allegations in this paragraph.

336. Suno admits that Mr. Mosley has acted as a strategic advisor to Suno. Suno admits the quoted language appears in Kristin Robinson, *Timbaland Becomes Strategic Advisor For AI Music Company Suno*, Billboard (Oct. 22, 2024), available at <https://www.billboard.com/pro/timbaland-strategic-advisor-ai-music-company-suno/>. To the

extent the allegations in this paragraph purport to characterize that article, that article speaks for itself.

337. Suno admits that Mr. Mosley has acted as a strategic advisor to Suno. Suno admits the cited article characterizes Mr. Mosley's role as described. To the extent the allegations in this paragraph otherwise purport to summarize or characterize that article, that article speaks for itself. Suno denies that Mr. Mosley oversees product development at Suno.

338. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

339. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

340. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

341. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

342. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

343. Suno denies the allegations in this paragraph.

344. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

345. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

AI Overfitting

346. Suno admits that “overfitting” is a concept in AI development. Suno denies the remaining allegations in this paragraph.

347. Suno admits that “overfitting” is a concept in AI development. Suno denies the remaining allegations in this paragraph.

348. Suno admits the quoted language appears in Google, *Machine Learning Crash Course*, available at <https://developers.google.com/machine-learning/crash-course/overfitting/overfitting>. To the extent the allegations in this paragraph purport to characterize or draw conclusions from that source, that document speaks for itself. To the extent the allegations in this paragraph contain or imply legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

349. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

350. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

351. Suno admits the quoted language appears in Yeong Zee Kin, *Nature of Data in Pre-Trained Large Language Models*, Future of Privacy Forum (July 6, 2025), available at <https://fpf.org/blog/nature-of-data-in-pre-trained-large-language-models/>. To the extent the allegations in this paragraph purport to characterize that document, that document speaks for itself. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

352. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno denies the remaining allegations in this paragraph.

353. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

354. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

355. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

356. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

357. Suno admits that its training data includes essentially all music files of reasonable quality that are accessible on the open Internet, abiding by paywalls, password protections, and the like. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

358. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno denies the remaining allegations in this paragraph.

359. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

Suno Downloaded Songs from Protected Platforms

360. Suno admits that it obtained audio data from YouTube for use as training data. The remaining allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

361. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

362. Suno admits that YouTube is a platform that allows users to stream audiovisual content. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding YouTube's terms, permissions, or technical restrictions, and on that basis denies them. The remaining allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

363. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, and on that basis denies them.

364. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding technological protection measures employed by third-party platforms, and on that basis denies them.

365. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

366. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them.

367. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them.

368. To the extent the allegations in this paragraph purport to summarize or characterize YouTube's Terms of Service, that document speaks for itself. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

369. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

370. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding purported YouTube design decisions, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

371. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding purported YouTube design decisions, and on that basis denies them.

372. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding YouTube's URL architecture, and on that basis denies them.

373. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding purported YouTube design decisions, and on that basis denies them.

374. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding purported YouTube design decisions, and on that basis denies them.

375. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding stream-ripping tools, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

376. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

377. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

378. To the extent the allegations in this paragraph purport to characterize an article in Billboard, that document speaks for itself. Suno denies the remaining allegations in this paragraph.

379. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

380. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

381. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

382. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them. Suno denies the remaining allegations in this paragraph.

383. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

Suno Does Not Qualify for Fair Use

384. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

385. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

386. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

387. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

388. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

389. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

390. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

391. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

392. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

393. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

394. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

395. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

396. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

397. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

398. Suno admits that its model was constructed by showing the program a vast amount of different kinds of sound recordings in order to derive statistical insights about those recordings. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno denies that Plaintiffs have identified any purported similarities between Suno outputs and songs purportedly owned by Plaintiffs, members of the putative class, or members of the putative subclass. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

399. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno denies that Plaintiffs have identified any purported similarities between Suno outputs and songs purportedly owned by Plaintiffs, members of the putative class, or members of the putative subclass. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

400. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them.

401. To the extent the allegations in this paragraph purport to summarize or characterize the conclusions in U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025), that document speaks for itself. To the extent

the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

402. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

403. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

404. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

405. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

406. Suno admits the quoted language appears in U.S. Copyright Office, *Copyright and Artificial Intelligence, Part 3: Generative AI Training (Pre-Publication Version)* (May 2025). To the extent the allegations in this paragraph purport to summarize or characterize that publicly available document, that document speaks for itself. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

407. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them.

408. The allegations in this paragraph contain legal conclusions to which no response is required. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

409. Suno admits the language quoted in footnote 90 appears in Michael Mignano, *Interview with Mikey Shulman (Suno CEO)*, at 43:55–44:53, posted on X (Twitter) (Mar. 8, 2024), available at <https://x.com/mignano/status/1766151562299163030>. To the extent the allegations in this paragraph purport to summarize or characterize or are inconsistent with the quoted language, Suno denies those allegations. Suno denies any remaining allegations of this paragraph.

410. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph about third-party examples, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

411. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

412. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

413. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. Suno lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations in this paragraph, and on that basis denies them.

414. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph about producer tags, and on that basis denies them.

415. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph about industry commentators, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

416. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them.

417. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

418. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph about industry commentators, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

419. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph about industry commentators, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

420. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

421. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph about industry commentators, and on that basis denies them. To

the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

422. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

423. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them.

424. Suno denies the allegations in this paragraph.

425. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding “AI” in general, and on that basis denies them.

426. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding “these acts,” and on that basis denies them. The allegations in this paragraph otherwise contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

427. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

428. Suno admits it has previously been valued at \$500,000,000. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on

that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

CLASS ACTION ALLEGATIONS

429. No response is required to the allegations in this paragraph because they are not allegations requiring a response but merely identify the procedural posture of the case. To the extent a response is required, Suno denies the allegations.

430. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action and denies the allegations of this paragraph.

431. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action and denies the allegations of this paragraph.

432. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action and denies the allegations of this paragraph.

433. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action on numerosity grounds and denies the allegations of this paragraph.

434. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action on commonality grounds and denies the allegations of this paragraph.

435. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action and denies the allegations of this paragraph.

436. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action on typicality grounds and denies the allegations of this paragraph.

437. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action on adequacy grounds and denies the allegations of this paragraph.

438. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action on predominance grounds and denies the allegations of this paragraph.

439. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action on superiority grounds and denies the allegations of this paragraph.

440. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action and denies the allegations of this paragraph.

441. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies that Plaintiffs are entitled to maintain a class action and denies the allegations of this paragraph.

CLAIMS FOR RELIEF

FIRST CAUSE OF ACTION

(Violation of Copyright Act, 17 U.S.C. § 106(1))

442. Suno incorporates by reference its responses to all allegations set forth in the previous paragraphs as if fully set forth herein.

443. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno lacks knowledge or information sufficient to admit or deny the allegations of this paragraph, and on that basis denies those allegations. Suno otherwise denies the remaining allegations of this paragraph.

444. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno lacks knowledge or information sufficient to admit or deny the allegations of this paragraph concerning Plaintiffs' or Class Members' copyrighted songs, and on that basis denies those allegations. Suno otherwise denies the remaining allegations of this paragraph.

445. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno lacks knowledge or information sufficient to admit or deny the allegations of this paragraph concerning Plaintiffs' or Class Members' copyrighted songs, and on that basis denies those allegations. Suno otherwise denies the remaining allegations of this paragraph.

446. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno lacks knowledge or information sufficient to admit or deny the allegations of this paragraph concerning Plaintiffs' or Class Members' copyrighted songs, and on that basis denies those allegations. Suno otherwise denies the remaining allegations of this paragraph.

447. The allegations in this paragraph contain legal conclusions to which no response is required.

448. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies them on that basis. Suno denies that it has caused any harm to Plaintiffs.

SECOND CAUSE OF ACTION

(Violation of Copyright Act, 17 U.S.C. § 106(2))

449. Suno incorporates by reference its responses to all allegations set forth in the previous paragraphs as if fully set forth herein.

450. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno lacks knowledge or information sufficient to admit or deny the allegations of this paragraph concerning Plaintiffs' or Class Members' copyrighted songs, and on that basis denies those allegations. Suno otherwise denies the remaining allegations of this paragraph.

451. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph concerning Plaintiffs' or Class Members' copyrighted songs, and on that basis denies those allegations.

452. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno lacks knowledge or information sufficient to admit or deny the allegations of this paragraph concerning Plaintiffs' or Class Members' distribution rights, and on that basis denies those allegations. Suno otherwise denies the remaining allegations of this paragraph.

453. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations of this paragraph. Suno denies that its model is designed to generate outputs that replicate, reproduce, or sound like existing sound recordings or songs.

454. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations of this paragraph.

455. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno lacks knowledge or information sufficient to admit or deny the allegations of this paragraph concerning Plaintiffs' or Class Members' copyrighted songs, and on that basis denies those allegations. Suno otherwise denies the remaining allegations of this paragraph.

456. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations of this paragraph.

457. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno lacks knowledge or information sufficient to admit or deny the allegations of this paragraph concerning Plaintiffs' or Class Members' copyrighted songs, and on that basis denies those allegations. Suno otherwise denies the remaining allegations of this paragraph.

458. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno lacks knowledge or information sufficient to admit or deny the allegations of this paragraph concerning Plaintiffs' or Class Members' copyrighted songs, and on that basis denies those allegations. Suno otherwise denies the remaining allegations of this paragraph.

459. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

460. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

THIRD CAUSE OF ACTION

(Violation of the Digital Millennium Copyright Act, 17 U.S.C. § 1201)

461. Suno incorporates by reference its responses to all allegations set forth in the previous paragraphs as if fully set forth herein.

462. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

463. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them.

464. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

465. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

466. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

467. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

468. Suno admits that constructing its generative AI tool required showing the program tens of millions of instances of different kinds of recordings in order to derive statistical insights about them. To the extent the allegations in this paragraph contain legal conclusions, no response

is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

469. Suno admits that its training data includes essentially all music files of reasonable quality that are accessible on the open Internet, abiding by paywalls, password protections, and the like. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis. Suno denies the remaining allegations in this paragraph.

470. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph, and on that basis denies them. Suno denies any remaining allegations in this paragraph.

471. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding Plaintiffs, members of the putative class, or members of the putative subclass, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

472. Suno lacks knowledge or information sufficient to form a belief as to the truth of the allegations in this paragraph regarding the terms of service of third-party platforms, and on that basis denies them. To the extent the allegations in this paragraph contain legal conclusions, no response is required. To the extent a response is required, Suno denies the allegations on that basis.

473. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

474. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

475. The allegations in this paragraph contain legal conclusions to which no response is required. To the extent a response is required, Suno denies the allegations on that basis.

FOURTH CAUSE OF ACTION

(Violation of the Tennessee Consumer Protection Act, Tenn. Code Ann. § 47-18-104)

476. The Court dismissed this claim pursuant to Federal Rule of Civil Procedure 12(b)(6). To the extent any response is required, Suno denies the allegations in this paragraph.

477. The Court dismissed this claim pursuant to Federal Rule of Civil Procedure 12(b)(6). To the extent any response is required, Suno denies the allegations in this paragraph.

478. The Court dismissed this claim pursuant to Federal Rule of Civil Procedure 12(b)(6). To the extent any response is required, Suno denies the allegations in this paragraph.

479. The Court dismissed this claim pursuant to Federal Rule of Civil Procedure 12(b)(6). To the extent any response is required, Suno denies the allegations in this paragraph.

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485. The Court dismissed this claim pursuant to Federal Rule of Civil Procedure 12(b)(6). To the extent any response is required, Suno denies the allegations in this paragraph.

PRAYER FOR RELIEF

In response to the Prayer for Relief, Suno denies that Plaintiffs are entitled to the requested relief, or to any relief whatsoever.

JURY DEMAND

With respect to the jury demand contained in Plaintiffs' First Amended Complaint, Suno states that no response is required. To the extent a response is deemed required, Suno denies that all of Plaintiffs' claims are properly triable to a jury.

AFFIRMATIVE DEFENSES

In further answer to the allegations made by Plaintiffs in the First Amended Complaint, Suno asserts the following affirmative defenses, incorporating by reference all of the preceding material, including without limitation the Preliminary Statement above. Suno does not concede that it has the burden of proof on the defenses listed below.

FIRST AFFIRMATIVE DEFENSE

To the extent there is copying of copyrightable expression, that copying constitutes fair use pursuant to 17 U.S.C. § 107. Suno's AI tool uses a back-end technological process, invisible to the public, in the service of creating an ultimately non-infringing new product. This is quintessential fair use.

SECOND AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, by the doctrines of copyright misuse and unclean hands. The defense of copyright misuse applies when a defendant can prove one of the following: (1) a violation of the antitrust laws; (2) that the copyright owner otherwise illegally extended its monopoly; or (3) that the copyright owner violated the public policies underlying the copyright laws. The effect of a finding of copyright misuse is to preclude enforcement of the copyright or copyrights at issue during the period of misuse, and the defense is available even if the defendant has not itself been injured by the misuse. On information and belief, Plaintiffs have

engaged in anticompetitive activities that extend an unlawful monopoly over the production and commercialization of music, which by itself and/or in connection with other conduct satisfies each of the three alternative prongs above.

THIRD AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, by one or more other equitable doctrines, such as waiver, estoppel, and laches.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs' claims fail in whole or in part because the complained-of use was validly licensed by express or implied license.

FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs do not own or hold exclusive rights under 17 U.S.C. § 106 or any copyright law over each work that was allegedly infringed by Suno, including without limitation because some or all of the materials over which Plaintiffs claim copyright are in the public domain.

SIXTH AFFIRMATIVE DEFENSE

To the extent there is copying of copyrightable expression, that copying is de minimis.

SEVENTH AFFIRMATIVE DEFENSE

To the extent Plaintiffs establish any act of infringement, that infringement was innocent, allowing for the Court to reduce any award of statutory damages to an amount as low as \$200 per work infringed. 17 U.S.C. § 504(c)(2).

EIGHTH AFFIRMATIVE DEFENSE

Plaintiffs' remedies are barred at least in part by the applicable statutes of limitations.

NINTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have suffered no provable injury as a result of Suno's alleged copying.

TENTH AFFIRMATIVE DEFENSE

Plaintiffs’ claims for injunctive relief are barred, in whole or in part, because Plaintiffs have failed to state facts sufficient to support a claim for injunctive relief, and there is an adequate remedy at law.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiffs’ claims are barred, in whole or in part, because the copyright registrations purporting to cover some or all of the works in dispute are invalid and do not satisfy the requirements of 17 U.S.C. §§ 411–412.

TWELFTH AFFIRMATIVE DEFENSE

Plaintiffs’ claims under 17 U.S.C. § 1201 are barred, in whole or in part, because one or more Plaintiffs lack standing under Article III of the United States Constitution.

THIRTEENTH AFFIRMATIVE DEFENSE

Plaintiffs’ claims under 17 U.S.C. § 1201 are barred, in whole or in part, because Plaintiffs are not “person[s] injured” within the meaning of 17 U.S.C. § 1203(a) and therefore lack standing to maintain a civil action for any alleged violation under § 1201.

ADDITIONAL AFFIRMATIVE DEFENSES

Suno has not knowingly or intentionally waived any applicable defenses and reserves the right to assert and rely on other applicable defenses as may become available or apparent during discovery in this matter. Suno reserves the right to amend this Answer and/or its affirmative defenses.

REQUEST FOR RELIEF

WHEREFORE, Suno respectfully requests that this Court:

1. Enter judgment in Suno's favor and against Plaintiffs;
2. Dismiss all claims by Plaintiffs with prejudice;
3. Award Suno its attorneys' fees and costs to the extent permitted by law; and
4. Grant Suno such other and further relief as this Court deems just and proper.

Dated: September 3, 2026

Respectfully submitted,

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Counsel for Defendant Suno, Inc.

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 September 3, 2026 to those identified as non-registered participants.

/s/ Brittany N. Lovejoy
Brittany N. Lovejoy