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April 10, 2025

VIA CM/ECF

The Honorable Paul G. Levenson
United States District Court, District of Massachusetts
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 2300
Boston, Massachusetts 02210

Re: *UMG Recordings, Inc., et al. v. Suno, Inc., et al.*, No. 1:24-cv-11611-FDS (D. Mass)

Dear Judge Levenson:

Defendant Suno, Inc.’s (“Defendant” or “Suno”) files this notice of supplemental authority to draw the Court’s attention to a recent order that further supports Suno’s request to compel Plaintiffs’ production of documents related to Plaintiffs’ ownership of their Asserted Works as detailed in the Parties’ pending Joint Letter Regarding Discovery Dispute over Defendant, Suno, Inc.’s First Set of Requests for Production (Dkt. No. 70).

On April 8, 2025, in *UMG Recordings, Inc. v. Uncharted Labs, Inc.*, No. 24-cv-04777 (S.D.N.Y.), the Southern District of New York granted Uncharted Labs, Inc.’s (“Udio’s”) nearly identical request to compel production of documents related to Plaintiffs’¹ ownership of their Asserted Works. *See* Order Granting Motion to Compel, *Uncharted Labs, Inc.*, No. 24-cv-04777, Dkt. No. 89 (S.D.N.Y. Apr. 8, 2025) (attached hereto as Exhibit 1); *see also* Joint Letter Brief, *Uncharted Labs, Inc.*, No. 24-cv-04777, Dkt. No. 80. Specifically, the court granted Udio’s request to compel Plaintiffs’ production of “deposit copies of the Asserted Works and artist-label agreements for all ‘works made for hire’ for which Plaintiffs are listed as an author or owner on the registration,” holding that “[e]ach copyright must be proven on its own.” *See* Ex. 1 at 1, 3.

¹ Plaintiffs in *Uncharted Labs, Inc.* are represented by the same law firm as Plaintiffs here. With the exception of Atlantic Records Group LLC, Rhino Entertainment LLC, and The All Blacks U.S.A., the Plaintiffs here are also Plaintiffs in *Uncharted Labs, Inc.*

LATHAM & WATKINS LLP

Dated: April 10, 2025

Respectfully submitted,

/s/ Britt Lovejoy

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Counsel for Defendant Suno, Inc.

cc: All Counsel of Record (via CM/ECF)