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16 Attorneys for Plaintiff - Matthew Spatola

17 **UNITED STATES DISTRICT COURT**
18 **CENTRAL DISTRICT OF CALIFORNIA**

19 Matthew Spatola p/k/a Matty Spats,

20 Plaintiff,

21 v.

22 Jason Desrouleaux p/k/a Jason Derulo;
23 and

24 Sony Music Entertainment
25 d/b/a Columbia Records,

26 Defendants.

CASE NO. 23-06191

COMPLAINT FOR:

- 1. DECLARATORY JUDGMENT
- 2. ACCOUNTING

AND JURY DEMAND

27 Plaintiff Matthew Spatola (“Plaintiff” or “Spatola”) alleges as follows:

28 **JURISDICTION AND VENUE**

1. Spatola’s first claim for relief arises under the copyright laws of the United States, as amended, 17 U.S.C. § 101, *et. seq.* Accordingly, the Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and 1338.

1 and released the BTS remix without acknowledging Spatola and while cutting him
2 out completely from the writing credit and income received. *Savage Love* was an
3 international success, reaching number one on the respective charts of over fifteen
4 different countries and is certified multi-platinum in at least fourteen different
5 countries. At no time did Derulo or Sony ever get permission from, account to, or
6 even enter into any contract with, Spatola for his contributions to *Savage Love* and
7 the BTS remix.

8 8. Spatola is a Grammy-nominated professional producer, songwriter, and
9 musician for various high-profile music artists such as Drake and DJ Khaled. Prior
10 to working with Derulo on *Savage Love*, Spatola had worked with many different
11 artists such as Juice WRLD, aboogiewitdahoodie, Lil Uzi Vert, and Nipsey Hussle.
12 He has also performed on The Tonight Show Starring Jimmy Fallon, Jimmy Kimmel
13 Live, and Saturday Night Live.

14 9. Derulo has been an award-winning musician for over a decade. While
15 Derulo has had many successful songs throughout his career, *Savage Love* was
16 Derulo's second Billboard Hot 100 number-one hit in the United States, eleven years
17 after his first number one song, *Whatcha Say*. Both of Derulo's number one singles
18 are derived from other existing works. *Whatcha Say* debuted in 2009 using the
19 chorus and underlying composition of Imogen Heap's *Hide and Seek* from four
20 years earlier. *Hide and Seek* had gained widespread popularity due to its use in an
21 episode of the television series *The O.C.*, and even more fame when *Saturday Night*
22 *Live* made a parody of the episode in 2007. Heap clarified that although Derulo did
23 not publish the song before getting her permission, she was "pretty sure they had
24 already mastered it, and it was ready to go, and they were hoping everything would
25 be okay in the end."¹

26
27
28 ¹ <https://www.vulture.com/2019/04/songwriters-on-song-copying-sampling-interpolation.html>

1 10. Derulo created *Savage Love* in a similar fashion: by finding an existing
2 work and basing a new song around it, without first obtaining permission from the
3 author. *Savage Love* started by sampling a song that gained widespread fame on
4 TikTok called *Laxed (Siren - Beat)* (the “Sample”), which was authored by a New
5 Zealand teenager named Joshua Stylah, professionally known as Jawsh 685
6 (“Jawsh”). When Derulo and Spatola went into the studio to create *Savage Love*,
7 Derulo started the session by loading the Sample into Pro Tools, and from which
8 Spatola then wrote and recorded new instrumental contributions, to create the
9 instrumental version of *Savage Love*. When Derulo thereafter completed *Savage*
10 *Love* and posted it on his personal TikTok account, he completely failed to credit
11 Jawsh,² while also failing to credit Spatola in any way. A month later, after what
12 were likely significant negotiations between Sony, Jawsh, and Derulo, permission
13 was obtained to release *Savage Love*, contemporaneously with Jawsh being signed
14 to Derulo’s label Columbia Records, but without involving Spatola in any way.

15 11. Since the commercial release of *Savage Love*, Spatola requested that
16 Derulo provide him with credit for his work from Derulo directly. Although Derulo
17 originally agreed, after multiple follow-up messages, Derulo failed to follow
18 through and rightfully credit Spatola as a co-writer.

19 12. In April of 2023, Spatola was prepared to file a complaint in this Court
20 related to the claims discussed herein. Upon discussion with counsel for Derulo and
21 Sony, the Parties entered into a tolling agreement effective April 26, 2023, agreeing
22 to engage in good faith settlement negotiations. After the tolling agreement was
23 executed, however, Derulo and Sony failed to negotiate with Spatola. Derulo and
24 Sony claimed to have an agreement, signed by Spatola, which governed the
25 relationship between Spatola and Derulo. After numerous requests from Spatola,
26

27 ² [https://variety.com/2020/music/news/jason-derulo-tiktok-controversy-savage-love-laxed-siren-](https://variety.com/2020/music/news/jason-derulo-tiktok-controversy-savage-love-laxed-siren-beat-1234609101/)
28 [beat-1234609101/](https://variety.com/2020/music/news/jason-derulo-tiktok-controversy-savage-love-laxed-siren-beat-1234609101/)

1 Derulo and Sony failed to produce any such agreement. Accordingly, on June 30,
2 2023, Spatola supplied Derulo and Sony with notice of termination of the tolling
3 agreement, which terminated the agreement following the contractual 30-day period
4 thereafter. This complaint is now filed following the expiration of the tolling
5 agreement.

6 **THE PARTIES**

7 13. Plaintiff Spatola at all times relevant hereto was an individual residing
8 in the County of Los Angeles, California.

9 14. On information and belief, Defendant Derulo is, and at all times relevant
10 hereto was, an individual residing and doing business in the County of Los Angeles,
11 California.

12 15. Defendant Sony Music Entertainment (“Sony”), through its record label,
13 Columbia Records, distributed *Savage Love*, and at all times relevant hereto was a
14 Delaware corporation that conducts business and has at least one office in the
15 County of Los Angeles, California.

16 **ALLEGATIONS**

17 16. On April 22, 2020, just after 11:00 p.m., Spatola arrived at Derulo’s home
18 studio in Tarzana, California (“First Session”).

19 17. Spatola had been to Derulo’s home studio about five times prior to the
20 First Session but each time Spatola was collaborating with another producer, not
21 Derulo individually. The First Session was the first time that Derulo had personally
22 invited Spatola to his home studio.

23 18. Spatola has a unique feel when he writes guitar or bass sections, including
24 his strum patterns and bassline, such that it is usually identifiable by those who have
25 worked with Spatola.

26 19. Derulo had requested Spatola’s phone number from a mutual friend for
27 the purpose of collaborating together on a new song.
28

1 20. After Spatola arrived, a sound engineer loaded the Sample from Jawsh’s
2 Siren – Beat into Pro Tools.

3 21. After listening to the beat, Spatola began writing and recording the
4 instrumental additions to the track that eventually became *Savage Love*.

5 22. Through the early hours of April 23, 2020, Spatola and Derulo worked
6 together to create on different aspects of the work, which included modifying the
7 tempo, modifying the volume of certain instruments, adjusting the rhythm, crafting
8 the instrumental parts for the electric and acoustic guitars and electric bass, and
9 reimagining the overall feel of the song.

10 23. Specifically, *Savage Love* includes an acoustic section, of which the
11 instrumental portion was created from scratch by Spatola, and to which Derulo later
12 added vocals.

13 24. Little to no creative elements from Jawsh’s Sample are incorporated as
14 part of the acoustic section, which distinguishes it from the rest of *Savage Love*.

15 25. The instrumental feel in the acoustic section is defined by Spatola’s
16 acoustic guitar and bass elements contributed to the composition and sound
17 recording.

18 26. In addition to co-writing portions of *Savage Love* with Derulo, Spatola
19 also performed the electric and acoustic guitars and electric bass throughout the
20 sound recording. These parts substantially define the tone and feel of *Savage Love*.

21 27. While writing and performing the acoustic section and bass, Spatola
22 followed his own direction, made his own decisions, and ultimately wrote and
23 recorded what he felt was right for the song.

24 28. Spatola wrote and performed the electric bass and acoustic guitar sections
25 without any instruction from Derulo on the content or feel of the parts.

26 29. Spatola and Derulo wrote the electric guitar section collaboratively, with
27 Spatola performing the electric guitars on the sound recording, and as later used on
28 the BTS remix and other versions that Derulo later released.

1 30. Other aspects of the song were discussed and decided upon
2 collaboratively by both Derulo and Spatola, with neither party expressing dominant
3 authority.

4 31. At the end of the First Session, Derulo and Spatola had completed the
5 instrumental composition and base recording of *Savage Love*.

6 32. On April 27, 2020, Derulo sent a text message to Spatola, asking him to
7 come back to Derulo's studio around 6:00 p.m. that day and continue working on
8 *Savage Love* ("Second Session"). Exhibit 1.

9 33. Derulo wanted to record additional lyrics in the Second Session.

10 34. Spatola did not assist Derulo in authoring the lyrics of *Savage Love*, nor
11 performing the vocals. However, Derulo specifically requested that Spatola come
12 back into the studio to complete the song they had created together.

13 35. Spatola was only asked to join the Second Session because he assisted in
14 the creation of the song and was entrusted as the producer to make the adjustments
15 to the underlying music in order to match the lyrics.

16 36. At the end of the Second Session, Derulo and Spatola had created a final
17 version of *Savage Love*.

18 37. Spatola understood that, in the event that Derulo might ever release
19 *Savage Love*, Derulo and his record company would contact him to "clear" the work,
20 to sign paperwork authorizing its release and fairly compensating Spatola for his co-
21 authorship of the work.

22 38. But that never happened.

23 39. Following the Second Session, Derulo sent Spatola a text message asking
24 "1k good each day?" Exhibit 2. And Derulo subsequently paid Spatola \$2,000 for
25 the two days of time in the studio.

26 40. This payment was confirmed by Spatola's attempt to file Spatola's
27 American Federation of Musicians ("AFM") report in July 2020, shortly after the
28 commercial release of *Savage Love*. Exhibit 3.

1 41. Typically, music producers who work on a song will be paid an upfront
2 “session fee” which compensates the producer for their time in the studio. This is to
3 protect the producer from a song not being released, and their time working on the
4 project becoming valueless. The session fees and author’s credit and royalties are
5 not mutually exclusive.

6 42. Derulo teased the song on his TikTok account on May 10, 2020. Derulo
7 immediately received backlash for failing to credit Jawsh or get permission before
8 sampling the song and exploiting that sample on TikTok as part of *Savage Love*.

9 43. Derulo did not commercially release the song for another month, until he
10 and Sony had negotiated a deal with Jawsh, including finally securing authority to
11 use the Sample and to release *Savage Love*.

12 44. Despite negotiating the deal with Jawsh, on information and belief, the
13 Defendants did so without identifying to Jawsh that Spatola was a co-writer and co-
14 producer of *Savage Love*.

15 45. At the same time, Spatola has been seeking authorship credit since the
16 release of *Savage Love*, including through e-mail with multiple employees at AFM,
17 SAG-AFTRA, Sony, and even in direct communication with Derulo.

18 46. On July 21, 2020, Spatola filed his various AFM reports to claim co-
19 ownership and royalties for *Savage Love*. Exhibit 3.

20 47. Over the next two years, Spatola was consistently redirected to other
21 people to contact, told it was being handled in due time, and eventually outright
22 ignored.

23 48. On September 7, 2020, Spatola sent a text message to Derulo asking to
24 “touch base about possibly getting [his] name on Savage love as addition[al] guitar
25 and bass.” Exhibit 4.

26 49. Derulo replied to Spatola with “Hey bro yes. Send me your full name.”
27 Exhibit 5.

28

1 50. When Derulo failed to credit Spatola as promised, Spatola contacted
2 Derulo's tour manager, who also followed up with Derulo. Exhibit 6; Exhibit 7.

3 51. Neither Derulo nor his tour manager ever assisted Spatola to get credited
4 for his creative contributions to *Savage Love*.

5 52. Spatola never was asked to sign a work-for-hire agreement, nor any other
6 paperwork related to his co-authorship of *Savage Love*.

7 53. Neither Derulo nor Sony ever requested or obtained any agreement from
8 Spatola regarding *Savage Love*.

9 54. During 2021 and 2022, Derulo invited Spatola to return to his home studio
10 for other projects. At no point did Derulo state his intention to prevent Spatola from
11 rightfully obtaining his authorship credit for *Savage Love*.

12 55. Upon its release, *Savage Love* received substantial success, including
13 over 10 weeks in the top-10 on the Billboard HOT 100.

14 56. Derulo and Sony then further monetized *Savage Love* by negotiating the
15 release of a remix of *Savage Love* with world-renowned K-Pop group BTS, without
16 Spatola's permission, and without accounting to or providing any compensation
17 whatsoever to Spatola.

18 57. On October 17, 2020, the *Savage Love* remix peaked at number one.

19 58. *Savage Love* has gone platinum in around fifteen countries and is RIAA
20 certified quadruple platinum as of November 29, 2022.

21 59. On April 11, 2023, Spatola received his official copyright registration
22 from the United States Copyright Office for authorship and co-ownership of the
23 sound recording and musical composition of *Savage Love*. Exhibit 8.

24 60. *Savage Love* was Spatola's first time co-writing and producing with an
25 artist of international notoriety.

26 61. If Spatola had been properly credited as a co-author and co-producer of a
27 hit like *Savage Love*, he would have received additional opportunities that were lost
28 due to this lack of credit.

1 62. Composers credited with co-writing hit songs as writers are invited to
2 work with other top performers in the industry, along with other lucrative
3 opportunities.

4 63. As a direct result of Defendants' refusal to grant Spatola his rightfully
5 earned co-writing credit, Spatola was not given the opportunity to further advance
6 his career in the music industry as a benefit to helping Derulo create the chart-
7 topping song.

8 64. Had Derulo and Sony properly accounted to Spatola, he would have also
9 directly generated substantial royalties.

10 65. *Savage Love* is a multi-national hit that has sold millions of copies and
11 has over a billion streams, including remixes.

12 66. Defendants' refusal to credit Spatola as a co-writer and co-producer of
13 *Savage Love* has resulted in significant harm to Spatola.

14 **FIRST CLAIM FOR RELIEF**

15 **(Declaratory Judgment against all Defendants)**

16 67. Plaintiff repleads, realleges and incorporates by reference each allegation
17 contained in the preceding and foregoing paragraphs.

18 68. An actual and present controversy now exists between Spatola and
19 Defendants regarding Spatola's status as a co-writer and co-producer of the musical
20 composition of *Savage Love*.

21 69. Defendants have denied recognition of Spatola's co-authorship and co-
22 producer status, which would otherwise entitle Spatola to a writer's credit and a
23 share of the monies generated from the exploitation of *Savage Love*.

24 70. Spatola is also a co-writer and co-producer, along with Defendant Derulo,
25 of the sound recording of *Savage Love*. *Aalmuhammed v. Lee*, 202 F.3d 1227, 1231
26 (9th Cir. 2000) (holding that a joint work is "(1) a copyrightable work, [with] (2)
27 two or more 'authors,' and [where] (3) the authors intend their contributions be
28 merged into inseparable or interdependent parts of a unitary whole").

1 71. Spatola and Derulo each contributed separate and distinct copyrightable
2 components of the song *Savage Love*.

3 72. Spatola was not involved in writing the lyrics, but he was the driving force
4 in creating the instrumental portions and rhythmic patterns, especially as to the
5 acoustic section, with the remainder of the instrumental portions also created
6 primarily by Spatola with influence from Jawsh's Sample.

7 73. Spatola also performed all electric guitar, acoustic guitar and electric bass
8 performances that were incorporated into the sound recording of *Savage Love*.

9 74. Spatola's work on *Savage Love* qualifies him as an author, under a joint
10 work framework *Aalmuhammed*, 202 F.3d at 1234 (holding that the factors for
11 determining an "author" with respect to a joint work are: (1) 'superintending' the
12 work by exercising control, (2) make objective manifestations of shared intent to be
13 co-authors, and (3) the 'audience appeal' of the work turns on both contributions).

14 75. Each party had independent creative control over their respective
15 contributions and exercised that control during both studio sessions.

16 76. Spatola and Derulo each manifested the shared intent to co-write a song,
17 and then worked together to jointly create *Savage Love*. Each party intended for
18 their individual contributions to be merged into inseparable or interdependent parts
19 of a unitary composition.

20 77. Spatola contributed significantly to *Savage Love*, including by writing
21 and recording additional guitar and bass lines and Spatola's discretion.

22 78. Starting with the Sample, Spatola composed multiple additional
23 instruments to be added into an instrumental version of *Savage Love* at the end of
24 the First Session.

25 79. By the end of the Second Session, Spatola and Derulo had recorded what
26 would later be released as *Savage Love*. Spatola's additions helped turn a popular
27 TikTok song into the music underlying a multi-platinum record, generating
28 substantial audience appeal individually and jointly.

1 85. Defendants are in sole control of the books and records needed to
2 determine the amounts due to Spatola pursuant to their relationship as joint authors.
3 Spatola has no reasonable means by which he can obtain the information necessary
4 to calculate what is owed to him by Defendants.

5 86. Spatola is entitled to an order of this Court directing Defendants to render
6 a complete and honest accounting of all revenues derived from the exploitation of
7 *Savage Love* and all sums due to Spatola. Spatola is entitled to a judgment in the
8 amount of the sums shown due by such accounting.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Plaintiff pleads for judgment against Defendants as
11 follows:

12 1. That the Court declare that: (a) Spatola is a joint author and has
13 ownership of the sound recording of *Savage Love*; (b) Spatola is a joint author in the
14 composition of *Savage Love*; (c) Spatola is entitled to co-writer and co-producer
15 credit on the copyright of the sound recording and composition of *Savage Love*,
16 including on remixed versions of *Savage Love*; and (d) Spatola is entitled to
17 prospective and retroactive royalties and other money owed with respect to his
18 respective interest in the sound recording and composition of *Savage Love*, in a
19 percentage to be proven at trial;

20 2. That the Court order an accounting of all revenues derived from the
21 exploitation of *Savage Love* by Defendants, including but not limited to earnings
22 from licensor agreements;

23 3. That Spatola be awarded his reasonable attorney's fees and costs pursuant
24 to the U.S. Copyright Act, 17 U.S.C. § 505; and

25 4. For such other further relief as the Court deems just and proper.

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DEMAND FOR TRIAL BY JURY

Pursuant to Fed. R. Civ. P. 38(b), Plaintiff demands a trial by jury on all issues so triable raised in this complaint.

Date: July 31, 2023

Respectfully submitted,

/s/ Jacob A. Ayres

Jacob A. Ayres
GUPTA EVANS & AYRES, PC

Thomas E.M. Werge
WERGE LAW GROUP
pro hac vice forthcoming

Attorneys for Plaintiff
Matthew Spatola p/k/a Matty Spats

EXHIBIT 1

Music Business Worldwide (copy)

10:03

< 12



Jason >



iMessage

Apr 22, 2020, 11:08 PM

Hey what's good Jason it's Matty I just pulled up

Press 001 on call box

Apr 23, 2020, 2:13 AM

Jderulomusic@gmail.com

Apr 23, 2020, 1:33 PM

Hey what's up brotha good vibes last night lmk what to put on the invoice much love

Apr 27, 2020, 2:55 PM

Hey Matt it's Jason

Are u free tonight?

Hey what's up Jason yeah I'm free tonight

Like at 6

Yeah sounds good

Apr 27, 2020, 5:06 PM

You know a sax player?



iMessage



EXHIBIT 1

EXHIBIT 2

Music Business Worldwide (copy)

10:04

< 12



Jason >



You know a sax player?

I just texted my homie but he didn't answer

Do you have a Ukulele

Yeah I do

I'll bring it

My guy

On my way now

Just pull up

Apr 27, 2020, 11:18 PM

1k good each day?

Sounds good brotha appreciate u man 🙏

May 6, 2020, 2:43 PM

Hey what's up my b I missed ur call

Let's do 8

Bet



iMessage



EXHIBIT 2

EXHIBIT 3

Music Business Worldwide (copy)

Matthew Spatola - Certifying for Benefits Inbox x



Ghena N <contactghena@gmail.com>
to Erick ▾

Jul 21, 2020, 9:56 PM ☆ ↶ ⋮

Hi Erick!

Once again thank you for taking the time to talk to us over the phone. Much appreciated!

We had to go over a few details with the forms but as promised here are 4 filled out AFM form for work that Matty did as a musician. He has already been paid his session fee for each one and this is only to certify for benefits and to make sure he can collect residuals via SAAG AFTRA.

Let me know if you need any additional information or if there is anything we need to edit.

Sincerely,
Ghena

4 Attachments • Scanned by Gmail ⓘ



EXHIBIT 4

Music Business Worldwide (copy)

10:04



Jason >



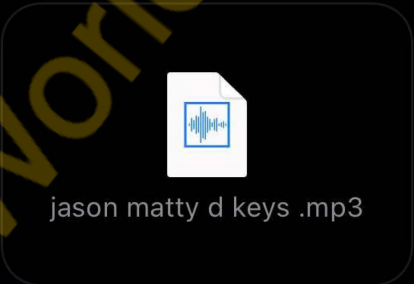
Great vibes last night man i our some better plugs ins on the guitar and messed around with some keys idea for next time we lock in 🤘

May 7, 2020, 9:41 PM

Great vibes for sure

Ok sick

Jul 7, 2020, 10:40 AM



What's good brotha I just got back in town. i bounced down the Whitney joint with the new plug ins on the guitar and my homie put some keys on it. I also added a ending let kno what you think brotha

Sep 7, 2020, 12:48 PM

Hey what's good brotha hope all is well just wanted to touch base about possibly getting my name on Savage love as addition guitar and bass

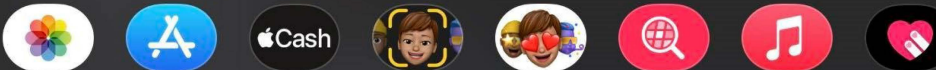


EXHIBIT 5

Music Business Worldwide (copy)

10:04

< 12



Jason >



Hey bro yes

Send me your full name

Thanks brotha appreciate it man it's Matthew Spatola and congrats on all the success with the record brotha much love

Jan 2, 2021, 11:01 PM

Hey broski

U up?

Yeah what's up brotha

Can u come through

Yeah I can come by

Coo we In Stu

Bet

Jan 3, 2021, 7:11 PM

Good vibes last night Brotha this record is coming out crazy! Lmk when u wanna get together and finish it I still feel like the second verse needs something and mayb a double hook broken down at the end with the



iMessage



EXHIBIT 5

EXHIBIT 6

Music Business Worldwide (copy)

10:27



Henry >



What's good Brotha just wanted to touch base with you and ask if there are any updates about putting my name on savage love for additional guitar and bass. Where would I find that information I believe it needs to be on my genius. Also I've been trying to register it with sag aftra and Afm. But the label is not able to confirming that I was a part of the record. Thanks for your help Henry



Just followed up

Awesome thanks Henry 🙌 I'll be over there later tonight appreciate you man

Nov 23, 2020, 10:28 PM

What's good Brotha I think I left My laptop charger over there on Thursday night did u find one in room b ?

I didn't see one, I'll ask around

Appreciate it Brotha

Nov 28, 2020, 9:41 PM



iMessage



EXHIBIT 6

EXHIBIT 7

Music Business Worldwide (copy)

10:28



Henry >



Appreciate it Brotha

Nov 28, 2020, 9:41 PM

What's good Brotha just wanted to touch base bout the credit on savage love again any updates ?

Dec 12, 2020, 3:42 PM



CONTROL (ROUGH) - OS...



This the joint me and AP did and my emails is mattyspats@gmail.com appreciate you brotha

Dec 15, 2020, 5:29 PM

Hey Henry did u ever email me the labels contact info? so I can contact them to get to my name on savage love as additional guitar and bass. I need this done if I want to get my performance royalty's through sag aftra Afm. I believe I need my genius account to reflect that I was apart of savage love. Aswell as updates on wiki and Apple Music. Please give me em



iMessage



EXHIBIT 7

EXHIBIT 8

Music Business Worldwide (copy)

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*,



attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Shira Perlmutter
United States Register of Copyrights and Director

Registration Number

SR 957-816

Effective Date of Registration:

April 11, 2023

Registration Decision Date:

April 12, 2023

Title

Title of Work: Savage Love (Laxed - Siren Beat)

Completion/Publication

Year of Completion: 2020
Date of 1st Publication: June 11, 2020
Nation of 1st Publication: United States

Author

- Author:** Matthew Spatola
Author Created: sound recording, music & lyrics
Citizen of: United States
Domiciled in: United States
- Author:** Jason Joel Desrouleaux
Pseudonym: Jason DeRulo
Author Created: sound recording, music & lyrics
Citizen of: not known
Domiciled in: not known
Pseudonymous: Yes
- Author:** Joshua Christian Nanai
Author Created: sound recording, music & lyrics
Citizen of: not known
Domiciled in: not known
- Author:** Philippe Henri Greiss
Author Created: sound recording, music & lyrics
Citizen of: not known
Domiciled in: not known
- Author:** Jacob Kasher Hindlin
Author Created: sound recording, music & lyrics

Citizen of: not known
Domiciled in: not known

Copyright Claimant

Copyright Claimant: Matthew Spatola
6831 1/2 HINDS AVE, North Hollywood, CA, 91605

Rights and Permissions

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NORTH HOLLYWOOD, CA 91605

Certification

Name: Greg Corbin
Date: April 11, 2023

Correspondence: Yes