

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

UMG RECORDINGS, INC., CAPITOL
RECORDS, LLC, and SONY MUSIC
ENTERTAINMENT,

Plaintiffs,

vs.

SUNO, INC. and JOHN DOES 1-10,

Defendant.

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

PLAINTIFFS' MOTION FOR LEAVE TO AMEND COMPLAINT

Plaintiffs hereby move for leave to amend their Complaint pursuant to Rule 15(a)(2) and Rule 16(b)(4) of the Federal Rules for Civil Procedure (the “Motion”).

Plaintiffs’ Proposed Second Amended Complaint is attached as **Exhibit A** to the Declaration of Rajan S. Trehan. A blackline comparison between Plaintiffs’ Proposed Second Amended Complaint and their original Complaint is attached as **Exhibit B** to the Declaration of Rajan S. Trehan. Plaintiffs’ Proposed Second Amended Complaint asserts additional copyrighted sound recordings that Suno infringed. Specifically, the Proposed Second Amended Complaint asserts 61,026 copyrighted works which Suno copied and ingested into its generative AI models. Plaintiffs identified these additional works in discovery once granted access to Suno’s training data.

The Proposed Second Amended Complaint also includes the allegations in Plaintiffs’ Proposed Amended Complaint. Dkt. No. 126-3. Plaintiffs’ Motion for Leave to Amend Complaint filed on September 19, 2025 remains pending. Dkt. No. 126. Thus the Proposed Second Amended Complaint also alleges a violation of 17 U.S.C. § 1201(a) based on Suno’s “stream ripping.”¹

Good cause exists to grant leave to amend given Plaintiffs’ diligence in uncovering and investigating the composition of Suno’s training data, and there can be no serious dispute that Plaintiffs have stated a viable claim for direct copyright infringement. Judicial economy and efficiency support Plaintiffs’ request to assert their expanded list of infringed works, which is based on the same underlying facts already alleged in the Complaint.

Pursuant to Local Rule 7.1(a)(2), Plaintiffs hereby certify to the Court that counsel for Plaintiffs made a good faith effort to meet and confer with Suno’s counsel and obtain Suno’s position in advance of filing this motion.

¹ Plaintiffs incorporate and reassert the allegations and arguments included in the Motion for Leave to Amend Complaint dated September 19, 2025 and supporting materials.

For the reasons further explained in their contemporaneously filed Memorandum of Law in Support of Motion for Leave to Amend Complaint, Plaintiffs respectfully request that the Court enter an order granting Plaintiffs leave to file their Proposed Second Amended Complaint.

Music Business Worldwide (copy)

Dated: May 21, 2026
New York, New York

By: Moez Kaba

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Counsel for Plaintiffs

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Mariah N. Rivera, hereby certify that, on May 11, 12, 13, and 15, 2026, I conferred with counsel for the defendant via email regarding this Motion. Counsel for the defendant confirmed that it opposes the Motion.



Mariah N. Rivera
Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that this document, which was filed with the Court through the CM/ECF system, will be sent electronically to all registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those identified as non-registered participants on May 21, 2026.



Rajan S. Trehan
Counsel for Plaintiffs