

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

SONY MUSIC ENTERTAINMENT, ARISTA  
MUSIC, and ARISTA RECORDS, LLC,

Plaintiffs,

v.

UNCHARTED LABS, INC., d/b/a Udio.com,  
and JOHN DOES 1-10,

Defendant.

Case No.: 1:24-cv-04777-AKH

**DECLARATION OF ANDREW SANCHEZ IN SUPPORT OF  
MOTION TO MAINTAIN PARTIALLY UNDER SEAL DOCKET ENTRIES 160-2, 160-  
4, 160-5, AND 160-8**

I, Andrew Sanchez, the undersigned, declare as follows:

1. I serve as Chief Executive Officer at Uncharted Labs, Inc. ("Udio"). I have personal knowledge of the facts set forth in this declaration and could competently testify to them if called as a witness.
2. I submit this declaration in accordance with Rule 4(B) of the Individual Rules of the Honorable Alvin K. Hellerstein and Paragraphs 22 and 23 of the Amended Confidentiality Stipulation and Protective Order entered in this case ("Protective Order"), Dkt. No. 147.
3. I understand that Plaintiffs have filed a second Motion for Leave to Amend the Complaint, as well as a Memorandum of Law in Support of Motion for Leave to Amend Complaint ("Memorandum"), Dkt. No. 160-2, a Proposed Second Amended Complaint, Dkt. No. 160-4, a redline of the Proposed Second Amended Complaint, Dkt. No. 160-5, and a Declaration of Daniel

Delorey in Support of Plaintiffs' Motion for Leave to Amend Complaint ("Delorey Declaration"), Dkt. No. 160-8.

4. Contained within each of these filings are references to the volume of audio files that Plaintiffs claim Udio used to train its generative AI models (the "Training Data Number").

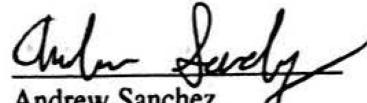
5. The Training Data Number is not public. As I understand it, Plaintiffs claim that their experts derived the Training Data Number by examining Udio's training data, which was made available in the context of this litigation and subject to the protections set forth in the Protective Orders, Dkts. 67, 147, and the Training Data Inspection Protocol, Dkt. 82. *See* Delorey Declaration ¶¶ 3-4.

6. Without conceding the specific accuracy of the Training Data Number, Udio regards information relating to the relative size of its training data as confidential, proprietary and commercially sensitive. In the competitive field of generative AI, the size of a company's training dataset is closely guarded because it reveals strategic business choices regarding model architecture and product development, including the volume of training data necessary to build a product like Udio's.

7. Revealing the Training Data Number could expose Udio to serious competitive harm. Specifically, competitors could develop and refine competing products with less research and development investment by using the Training Data Number to measure their own training datasets against Udio's and to extrapolate Udio's conclusions about the number of audio files necessary to build a competitive music generative AI model.

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

Executed on May 31, 2026 at New York, NY.

  
Andrew Sanchez  
UNCHARTED LABS, INC.