

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.

Civil Action No. 1:24-cv-04777-AKH


Joseph
6-2-26
[Signature]

**NOTICE OF MOTION TO FILE REDACTED PROPOSED AMENDED COMPLAINT,
MEMORANDUM OF LAW, AND DECLARATION OF DANIEL DELOREY**

Pursuant to Rule 4(B)(i) of this Court’s Individual Rules, Plaintiffs hereby submit this notice of motion to file a redacted version of Plaintiffs’ Proposed Second Amended Complaint, Memorandum of Law In Support of Motion for Leave to Amend Complaint, and Declaration of Daniel Delorey associated with Plaintiffs’ Motion for Leave to Amend Complaint on the public docket. These materials contain information that Defendant Uncharted Labs, Inc. d/b/a Udio (“Udio”) has indicated it believes to be sensitive confidential information that should be sealed from the public record. *See* Dkt. 147. Accordingly, Plaintiffs seek leave to file such designated material under seal to provide Udio an opportunity to file with the Court a statement of the reasons that such material shall be filed under seal. *See id.* ¶ 22 (“Within five business days of the filing of the motion to seal, the Designating Party will file with the Court a statement of reasons that the confidential material should be sealed that complies with Paragraph 4(B) of this Court’s Individual Practices”).

Plaintiffs expressly reserve the right to object to Udio’s sealing some or all of the designated material.

Dated: May 22, 2026
New York, New York

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