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10 **UNITED STATES DISTRICT COURT**
11 **CENTRAL DISTRICT OF CALIFORNIA**
12

13 AVIEL CALEV HIRSCHFIELD, an
individual,

14 Plaintiff,

15 vs.

16 AUBREY DRAKE GRAHAM, pka Drake, an
17 individual, OVO SOUND LLC, a California
limited liability company, UMG
18 RECORDINGS, INC., a Delaware
corporation, UNIVERSAL MUSIC
19 PUBLISHING, INC., a California corporation,
and DOES 1-20, inclusive,

20 Defendants.
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Case No. 2:26-cv-12115

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

1 Plaintiff Aviel Calev Hirschfield (“Plaintiff” or “Avi”), by and through his attorneys of
 2 record, alleges the following causes of action against Defendants Aubrey Drake Graham, pka
 3 Drake (“Drake”), OVO Sound LLC (“OVO”), UMG Recordings, Inc. (“UMG”), Universal Music
 4 Publishing, Inc. (“UMPG”), and Does 1-20, inclusive (collectively referred to as “Defendants”):

5 INTRODUCTION

6 1. Avi is a Grammy Award-winning hip-hop artist, producer, and engineer best
 7 known for producing and co-writing with Drake the record “Heated” from Beyoncé’s *Renaissance*
 8 album.

9 2. In 2025, Avi was on the road to Seattle, in a luxury Maybach generously loaned to
 10 him by a friend, when the song “I Follow Rivers” by indie artist Lykke Li came on his Apple
 11 Music station. Avi was reminded of how catchy the song’s hook was. And knowing that his
 12 favorite artist and former collaborator, Drake, was a fan of Lykke Li and had interpolated her
 13 music before, Avi immediately began thinking of a way to reimagine the song’s hook for Drake’s
 14 use in a hip-hop/rap record.

15 3. Avi had received audio files, containing music but no vocals, that were produced
 16 by Michael Mulé and Isaac De Boni—a prominent writing and producing duo known as FnZ that
 17 had worked with Drake on multiple hit tracks. With Drake in mind, in January 2026, in his home
 18 studio, Avi finished laying down his own vocals over FnZ’s music. Avi’s vocals included a now-
 19 ubiquitous chorus with original lyrics and melody that were loosely inspired by his car ride
 20 listening to Lykke Li’s “I Follow Rivers”:

21 *Reach me, baby*

22 *Call my phone and say you need me, baby*

23 *I’m so green, you gotta teach me, baby*

24 *From Vancouver, you a BC, baby*

25 *Pull up Maybach, beep beep, baby*

26 *And my shit came with the heat seats, baby*

27 *Swear my label gotta free me, baby*

28 *Blow on me just like some green tea, baby*

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4. Avi “bounced” the recording and sent it back to FnZ and other producers who work with Drake. But he heard nothing.

5. On or about May 15, 2026, Avi was listening to Apple Music and heard a new song from Drake, “Janice STFU.” Fifteen seconds in, Avi was stunned to hear Drake perform word-for-word, note-for-note, the *exact same chorus* that he (Avi) had recorded and sent around to FnZ and other producers who work with Drake.

6. Avi found online that FnZ were credited as producers of Janice STFU, and that Drake was the sole credited artist on digital streaming platforms. But the taking of his music was so literal that Avi assumed he was of course receiving co-writing credit on Janice STFU and a corresponding share of the revenues from the exploitation of the song, and that Defendants were not simply stealing his copyrighted music and claiming it as their own. In fact, however, that is exactly what Defendants have done.

7. Defendants have circled the wagons and claimed, absurdly, that *Drake* wrote the lyrics and melody for the chorus in Janice STFU on his own. Even after Avi’s manager provided Drake’s representatives the musical “stems” from the recording software that Avi used in January 2026, with metadata intact, proving that he wrote and recorded the chorus for Janice STFU long before Drake started working on the song, Defendants still shamelessly refuse to acknowledge Avi’s authorship of the chorus, and to credit and compensate him for the same. Indeed, without a hint of irony, Drake enlisted his litigation counsel to send a cease-and-desist letter to Avi demanding that he refrain from publicly stating—honestly—that he wrote Janice STFU’s chorus.

8. Janice STFU is Drake’s biggest hit in years. The song debuted at number one on the US Billboard Hot 100. It is Drake’s first song in nearly a decade to hold that number-one spot on the Hot 100 for multiple weeks, and it has surpassed “Hotline Bling” to become Drake’s longest-leading number-one single on the Billboard Hot Rap Songs chart. In just a few months, the song already has more than 300 million streams on Spotify. And as countless online comments will attest, the incredible success of Janice STFU is attributable almost entirely to the mesmerizing, singable chorus that Avi composed.

9. Defendants' refusal to acknowledge Avi's contributions to Janice STFU leaves him no choice but to turn to this Court for relief. Defendants' unauthorized use of Avi's original lyrics and music is a blatant and willful infringement of his copyrights, entitling Avi, *inter alia*, to the disgorgement of Defendants' ill-gotten profits, actual damages, and attorneys' fees.

JURISDICTION AND VENUE

10. This is a civil action arising under the Copyright Laws of the United States, 17 U.S.C. §§ 101 *et seq.* This Court therefore has original and exclusive jurisdiction over the subject matter pursuant to 28 U.S.C. §§ 1331 and 1338(a).

11. Venue is appropriate in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and 1400(a).

THE PARTIES

12. Plaintiff Aviel Calev Hirschfield is an individual who is a resident of Portland, Oregon.

13. On information and belief, Defendant Drake is an individual whose primary place of residence is Toronto, Canada. Plaintiff is informed and believes, and based thereon alleges, that Drake owns residences in Los Angeles County, California, where he resides at times. Drake conducts substantial business with individuals and entities located in Los Angeles County, California, including Defendants UMG and UMPG, has performed extensively in California, and distributes his music to California residents.

14. On information and belief, Defendant OVO is a California limited liability company with its principal place of business in Toronto, Canada.

15. On information and belief, Defendant UMG is a Delaware corporation with its operational headquarters at 2220 Colorado Avenue, Santa Monica, CA 90404.

16. On information and belief, Defendant UMPG is a California corporation with its operational headquarters at 2220 Colorado Avenue, Santa Monica, CA 90404.

GENERAL ALLEGATIONS

17. Between December 2025 and January 2026, Avi composed original lyrics and a vocal melody (hereinafter, the "Composition"). On or about January 25, 2026, in his home studio,

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1 Avi finished a recording of the Composition (hereinafter, the “Sound Recording”), which was set
 2 over an instrumental track that had been provided to him for his consideration. On information and
 3 belief, that instrumental track was produced by FnZ.

4 18. A true and correct copy of the Sound Recording is being lodged separately as
 5 **Exhibit 1** to this Complaint.

6 19. Avi registered both the Composition and his vocals from the Sound Recording
 7 (collectively referred to as the “Copyrighted Work” or “Work”) with the United States Copyright
 8 Office, Registration No. SRu 1-646-991. A true and correct copy of the registration certificate is
 9 attached hereto as **Exhibit 2**.

10 20. Plaintiff is informed and believes, and based thereon alleges, that Drake had access
 11 to the Copyrighted Work. Avi sent the Work to multiple producers who work with Drake,
 12 including FnZ, for their consideration. Plaintiff is further informed and believes, and based
 13 thereon alleges, that FnZ worked with Drake in producing the infringing work at issue—Janice
 14 STFU (also referred to as the “Infringing Work”).

15 21. Plaintiff is informed and believes, and based thereon alleges, that Drake willfully
 16 and slavishly copied protected elements of the Copyrighted Work in writing and producing Janice
 17 STFU, all without Avi’s authorization. Avi’s Work comprises an eight-line chorus with original
 18 lyrics and melody. The similarities between the chorus in that Copyrighted Work and the chorus in
 19 Janice STFU are beyond striking: Janice STFU’s chorus is *literally identical* to the Copyrighted
 20 Work in lyrics, melody, and cadence. There is such identity between the two that no assertion of
 21 independent creation or coincidence can be made with a straight face.

22 22. Janice STFU was released on or about May 15, 2026. Plaintiff is informed and
 23 believes, and based thereon alleges, that each of Defendants OVO, UMG, and UMPG has
 24 exploited, distributed, sold, monetized, and/or publicly performed this Infringing Work, and/or
 25 authorized third parties to do so, in violation of Avi’s exclusive rights in the Copyrighted Work.
 26 Specifically, Plaintiff is informed and believes, and based thereon alleges, among other things:
 27 that Janice STFU was released and distributed by OVO under exclusive license to Republic
 28 Records, a division of UMG; that UMG has sold, distributed, and exploited the Infringing Work

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1 on digital streaming platforms, and through the sale of physical copies, and collected and
 2 distributed revenues in connection therewith; and that UMPG has administered the publishing
 3 rights in the Infringing Work, including licensing the Infringing Work and collecting and
 4 distributing revenues relating to public performances of the Infringing Work.

5 23. Avi never consented to any of Defendants using the Copyrighted Work in the
 6 production or exploitation of Janice STFU.

7 24. Defendants' willful infringement of Avi's Copyrighted Work has caused him
 8 extraordinary damages. The immense success of Janice STFU is due principally to the song's
 9 chorus, which is a literal, word-for-word, note-for-note taking of the Copyrighted Work. Online
 10 commentators have referred to the chorus of Janice STFU—that is, *Avi's* chorus—as “impossibly
 11 catchy” and “addicting.” It is the *chorus* of Janice STFU—not other parts of the song—that fans
 12 sing along to. Defendants' unauthorized copying and infringement of Avi's Copyrighted Work, all
 13 without according him writing or other credit, has robbed Avi of the reputational benefits and
 14 substantial compensation he deserves for his contribution to Drake's biggest hit in many years.

15 25. Defendants' refusal to right this wrong is particularly audacious considering the
 16 evidence that Avi has voluntarily provided them recently, all of which leaves no doubt that a
 17 brazen and willful infringement has occurred. Through his representatives, Avi not only provided
 18 a copy of his Sound Recording to representatives of Drake so that they could observe that the
 19 Copyrighted and Infringing Works are identical, but he also provided the musical “stems” from
 20 the recording software that he used, which stems contain metadata proving that Avi created the
 21 Copyrighted Work *months before* Drake began working on Janice STFU. In spite of all this,
 22 Drake simply refuses to accept responsibility for stealing Avi's Copyrighted Work. On
 23 information and belief, Drake and/or his representatives are instead taking the absurd position that
 24 Avi—a massive fan of Drake who has co-written a hit song with him in the past and has
 25 aspirations of working with him in the future—has manipulated the metadata in his recording files
 26 to make it appear (falsely) that the Copyrighted Work preceded Janice STFU. Such a deception
 27 would constitute career suicide by Avi.
 28

26. With Defendants having rejected all attempts to resolve this matter privately and informally, Avi turns to this Court for relief.

FIRST CLAIM FOR RELIEF

(Copyright Infringement – Against All Defendants)

27. Avi incorporates by reference the preceding allegations as though fully set forth herein.

28. Avi is the sole author and owner of the Copyrighted Work.

29. Avi registered the Copyrighted Work with the United States Copyright Office (Registration No. SRu 1-646-991), which registration has an effective date of July 21, 2026. The Copyrighted Work includes the Composition.

30. Each of Defendants has copied, distributed, publicly performed, and/or monetized Avi's Composition as copyrighted in the Copyrighted Work, or authorized third parties to do so, through the creation and exploitation of the Infringing Work as alleged above, all without Avi's authorization or consent.

31. As a result of Defendants' infringement of the Copyrighted Work as described above, Avi has suffered damages and will continue to suffer damages in an amount that is presently unknown.

32. Defendants' infringement entitles Avi to recover, among other things, his actual damages and Defendants' profits attributable to the infringement. Alternatively, Defendants' infringement entitles Avi to an award of statutory damages, which damages are enhanced because of the willfulness of the infringement.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief as follows:

1. For actual and compensatory damages according to proof at trial;
2. For the disgorgement of Defendants' profits attributable to the infringement of the Copyrighted Work, and/or for statutory damages, including enhanced statutory damages for Defendants' willful infringement of the Copyrighted Work;
3. For pre-judgment and post-judgment interest at the maximum rate permitted by

1 law;

2 4. For Plaintiff's attorneys' fees;

3 5. For costs of suit as allowed by law; and

4 6. For such further relief as the Court may deem just and proper.

5
6 DATED: October 16, 2026

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7
8 By: 

9 Gregory P. Korn

10 Attorneys for Plaintiff Aviel Calev Hirschfield

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DEMAND FOR JURY TRIAL

Pursuant to L.R. 38-1, Plaintiff Aviel Calev Hirschfield hereby demands a trial by jury on all issues so triable.

DATED: October 16, 2026

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By:



Gregory P. Korn

Attorneys for Plaintiff Aviel Calev Hirschfield