

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UMG RECORDINGS, INC., CAPITOL
RECORDS, LLC, SONY MUSIC
ENTERTAINMENT, ATLANTIC
RECORDING CORPORATION, ATLANTIC
RECORDS GROUP LLC, RHINO
ENTERTAINMENT LLC, THE ALL
BLACKS U.S.A., INC., WARNER MUSIC
INTERNATIONAL SERVICES LIMITED,
and WARNER RECORDS INC.,

Plaintiffs,

v.

SUNO, INC., and JOHN DOES 1-10,

Defendant.

Case No. 1:24-cv-11611-FDS

JOINT MOTION TO AMEND THE AMENDED SCHEDULING ORDER

Pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Sony Music Entertainment, Atlantic Recording Corporation, Atlantic Records Group LLC, Rhino Entertainment LLC, The All Blacks U.S.A., Inc., Warner Music International Services Limited, and Warner Records Inc. (“Plaintiffs”) and Defendant Suno, Inc. (“Suno”) (together, the “Parties”), respectfully request that the Court amend the Amended Scheduling Order.

In support of this motion, the Parties state as follows:

1. Plaintiffs filed their Complaint on June 24, 2024.
2. Suno answered the Complaint on August 1, 2024.
3. The Court entered a Scheduling Order on October 28, 2024 (Dkt. 42). The Scheduling Order set the Parties’ deadline for serving written discovery as March 19, 2025.

4. The Court entered an Amended Scheduling Order on January 30, 2025 (Dkt. 57).

5. The Parties submitted a Joint Motion for Extension of Time to Serve Written Discovery on April 29, 2025, requesting that the Court extend the deadline for serving written discovery to May 30, 2025 (Dkt. 100).

6. The Court granted the Joint Motion for Extension of Time to Serve Written Discovery on April 30, 2025.

7. The Parties submitted a Joint Motion for Extension of Time to Serve Written Discovery on May 29, 2025, requesting that the Court extend the deadline for serving written discovery to June 27, 2025 (Dkt. 102).

8. The Court granted the Joint Motion for Extension of Time to Serve Written Discovery on May 30, 2025.

9. The Parties submitted a Joint Motion to Amend the Scheduling Order on June 26, 2025, requesting that the Court extend the deadlines for substantial completion of document production to August 15, 2025, and fact discovery to October 10, 2025 (Dkt. 108).

10. The Court granted the Joint Motion to Amend the Scheduling Order on June 30, 2025.

11. Plaintiffs served their First Set of Requests for Production on August 19, 2024. Plaintiffs served their Second Set of Requests for Production on April 24, 2025. Plaintiffs served their Third Set of Requests for Production on September 10, 2025.

12. Suno served its First Set of Requests for Production on September 13, 2024. Suno served its Second Set of Requests for Production on April 14, 2025. Suno served its Third Set of Requests for Production on June 19, 2025.

13. Over the last year, the parties have continued to negotiate regarding the proper

scope of discovery. The parties' agreed-upon deadline for substantial completion of document production with respect to certain previously-served discovery was August 15, 2025. *See* Dkt. 109. However, discovery is ongoing, and both parties have outstanding disputes.

14. In addition, on August 27, 2025, Plaintiffs informed Suno that they intend to file a motion for leave to amend their complaint to add a cause of action for violation of Section 1201(a)(1)(A) of the Digital Millenium Copyright Act.

15. On September 11, 2025, Plaintiffs first provided Suno with a copy of their proposed amended complaint.

16. The parties met and conferred and, in order to narrow disputes related to Plaintiffs' motion, agreed to an extension to the fact discovery deadline in order to allow for the completion of outstanding discovery in this case, including any appropriate discovery on Plaintiffs' proposed new claim in the event their motion to amend is granted. As such, Suno will not oppose Plaintiffs' motion to amend to add a cause of action for violation of Section 1201(a)(1)(A) of the Digital Millenium Copyright Act on the basis of undue delay or impact to the case schedule, but otherwise reserves rights to oppose the motion on other grounds.

WHEREFORE, the Parties respectfully request that the Court grant this Motion and amend the Amended Scheduling Order as follows

Event	Current Due Date	Proposed Date
Plaintiffs' deadline to File Motion to Amend		September 19, 2025
Fact Discovery (except for RFAs) and Depositions	Oct. 10, 2025	January 9, 2026 or ninety days from a Court order granting Plaintiffs' motion to amend, whichever is later
RFAs	Oct. 21, 2025	2 weeks after the Fact Discovery deadline

Remaining Discovery disputes (except for RFAs and experts)	Oct. 24, 2025	1 week after the RFA deadline
Trial Expert Disclosure	Nov. 21, 2025	3 weeks after the Discovery Dispute deadline
Rebuttal Experts	Dec. 19, 2025	4 weeks after the Expert Disclosure deadline
Trial Expert Depositions	Feb. 13, 2026	8 weeks after the Rebuttal Expert Disclosure deadline
Dispositive Motions	Mar. 13, 2026	5 weeks after the Expert Deposition deadline

Dated: September 15, 2025

s/ Rajan S. Trehan

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