

**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, and The All Blacks U.S.A., Inc., (“Plaintiffs”) and Defendant Suno, Inc. (“Suno”) (together, the “Parties”), respectfully request that the Court amend the Amended Scheduling Order (Dkt. 57).

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. The Parties submitted a Joint Motion to Amend the Scheduling Order on September 15, 2025, requesting that the Court set a deadline for submission of Plaintiffs' motion for leave to amend their complaint, and extend the deadline for completion of fact discovery to January 9, 2026 or ninety days from a Court order granting Plaintiffs' motion, whichever is later (Dkt. 124).

12. The Court granted the Joint Motion to Amend the Scheduling Order on October 3, 2025. Plaintiffs' motion for leave to amend remains pending.

13. 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.

14. 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.

15. 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.

16. This extension is intended to allow the parties to resolve outstanding discovery disputes and complete document production before moving to the next stages of discovery—namely, fact witness depositions and expert discovery—and to avoid preventable disputes regarding missing or incomplete information. This extension is also intended to address the upcoming holiday season, which will make conferral difficult as the parties, as well as various third parties who have been subpoenaed to produce documents, will be closed for the season.

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
Fact Discovery (except for RFAs) and Depositions	Jan. 9, 2026 or ninety days from a Court order granting Plaintiffs' motion to amend, whichever is later	March 6, 2026 or ninety days from a Court order granting Plaintiffs' motion to amend, whichever is later
RFAs	Jan. 23, 2026	2 weeks after the Fact Discovery deadline
Remaining Discovery disputes (except for RFAs and experts)	Jan. 30, 2026	1 week after the RFA deadline
Trial Expert Disclosure and Initial Expert Reports	Feb. 20, 2026	3 weeks after the Discovery Dispute deadline
Rebuttal Expert Reports	Mar. 20, 2026	4 weeks after the Expert Disclosure deadline
Reply Expert Reports	N/A	4 weeks after the Rebuttal Expert Disclosure deadline
Trial Expert Depositions	May 15, 2026	8 weeks after the Reply Expert Disclosure deadline
Dispositive Motions	June 19, 2026	5 weeks after the Expert Deposition deadline

Dated: December 17, 2025

s/ Rajan S. Trehan

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