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12 BMG RIGHTS MANAGEMENT (US) LLC

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN JOSE DIVISION**

17 BMG RIGHTS MANAGEMENT (US)
18 LLC d/b/a BMG APOLLO, d/b/a BMG
BESPOKE SONGS, d/b/a BMG
19 BESPOKE US, d/b/a BMG BESPOKE
WORKS, d/b/a BMG BLUE, d/b/a
20 BMG BUMBLEBEE, d/b/a BUG
MUSIC, d/b/a BMG CICADA, d/b/a
21 BMG DIAMOND SONGS, d/b/a BMG
FIREFLY, d/b/a BMG GEMINI, d/b/a
22 BMG GOLD SONGS, d/b/a BMG
MERCURY, d/b/a BMG MONARCH,
23 d/b/a BMG ONYX SONGS, d/b/a BMG
PLATINUM SONGS US, d/b/a BMG
24 PRODUCTION MUSIC US, d/b/a BMG
PRODUCTION SONGS, d/b/a BMG
25 PRODUCTION WORKS, d/b/a BMG
RUBY SONGS, d/b/a BMG SAPPHIRE
26 SONGS, d/b/a BMG SILVER SONGS,
d/b/a BMG STERLING, d/b/a BMG
27 TAMBORA, d/b/a BMG TITANIUM
SONGS, d/b/a MUSIC OF
28 WINDSWEPT, d/b/a SONGS OF

Case No. 5:26-cv-02334-EKL

**AMENDED COMPLAINT AND
DEMAND FOR JURY TRIAL**

1 WINDSWEPT PACIFIC, and d/b/a
2 WINDSWEPT PACIFIC SONGS,

3 Plaintiff,

4 v.

5 ANTHROPIC PBC,

6 Defendant.

1 Plaintiff BMG Rights Management (US) LLC, d/b/a BMG Apollo, d/b/a
 2 BMG Bespoke Songs, d/b/a BMG Bespoke US, d/b/a BMG Bespoke Works, d/b/a
 3 BMG Blue, d/b/a BMG Bumblebee, d/b/a Bug Music, d/b/a BMG Cicada, d/b/a
 4 BMG Diamond Songs, d/b/a BMG Firefly, d/b/a BMG Gemini, d/b/a BMG Gold
 5 Songs, d/b/a BMG Mercury, d/b/a BMG Monarch, d/b/a BMG Onyx Songs, d/b/a
 6 BMG Platinum Songs US, d/b/a BMG Production Music US, d/b/a BMG
 7 Production Songs, d/b/a BMG Production Works, d/b/a BMG Ruby Songs, d/b/a
 8 BMG Sapphire Songs, d/b/a BMG Silver Songs, d/b/a BMG Sterling, d/b/a BMG
 9 Tambora, d/b/a BMG Titanium Songs, d/b/a Music Of Windswept, d/b/a Songs Of
 10 Windswept Pacific, and d/b/a Windswept Pacific Songs (individually and
 11 collectively, “BMG”), by its attorneys, Manatt, Phelps & Phillips, LLP, alleges the
 12 following in support of its claims and causes of action against Defendant Anthropic
 13 PBC (“Anthropic”).

14 **NATURE OF THE ACTION**

15 1. BMG brings this action to right Anthropic’s pervasive infringement of
 16 copyrighted musical compositions owned or controlled by BMG. Anthropic, a
 17 technology company known for developing a group of artificial intelligence (“AI”)
 18 models known as Claude (“Claude” or “Claude models”), has unlawfully copied,
 19 prepared derivative works based on, and distributed musical compositions owned
 20 by BMG, among vast amounts of other copyrighted works. In so doing, Anthropic
 21 has blatantly violated the copyright laws and caused direct harm to BMG and the
 22 songwriters it proudly represents. Generations of inventors have brought
 23 revolutionary new products to market while complying with copyright law.
 24 Anthropic’s rapid development of its new technology is no excuse for its egregious
 25 law-breaking.

26 2. These claims are not new to Anthropic. BMG is one of many copyright
 27 holders who Anthropic’s blatant disregard for U.S. copyright law has harmed. This
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1 action follows others that have already shed light on Anthropic’s pervasive
 2 infringements.¹ BMG seeks to rectify the damage Anthropic has done to BMG’s
 3 rights and those of the songwriters it represents.

4 3. Anthropic was founded in or around 2021, when a group of OpenAI
 5 employees left to start a competing AI company. Anthropic’s founders claimed to
 6 be starting a different kind of company, one with AI safety and research at the
 7 forefront that would mitigate AI’s risks. But in its pursuit of those goals, Anthropic
 8 ran roughshod over the rights of countless creatives and rightsholders, using their
 9 works without permission, removing identifying information from those works, and
 10 keeping ill-gotten gains for itself. Among the works stolen by Anthropic in its rush
 11 to create a new AI behemoth are those owned or controlled by BMG—works
 12 created both by songwriters who are household names as well as those living check
 13 to check, all of whom BMG takes great pride in representing.

14 4. Anthropic’s infringement of BMG’s copyrighted musical compositions
 15 occurs throughout the lifecycle and development of its Claude models. Upon
 16 information and belief, this infringement began right from Anthropic’s start and
 17 continues today. To first develop or “train” its Claude models, Anthropic copied an
 18 enormous volume of text from sources on the Internet through several means,
 19 including using automated scraping tools to copy text without authorization from
 20 public websites and through torrenting files from illegal online pirate libraries, as
 21 publicly available information indicates. Compounding its unlawful conduct,
 22 Anthropic also uploaded to the Internet and shared with the public additional copies
 23 of these pirated works through torrenting. Upon information and belief, this
 24 enormous collection of data downloaded and reshared by Anthropic includes
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26 ¹ See, e.g., *Bartz v. Anthropic PBC*, No. 3:24-cv-05417-AMO (N.D. Cal. Aug. 19,
 27 2024) (*Bartz*); *Concord Music Group, Inc. v. Anthropic PBC*, No. 5:24-cv-03811-
 28 EKL (N.D. Cal. Jun 26, 2024) (*Concord I*); *Concord Music Group, Inc. v.*
Anthropic PBC, No. 5:26-cv-00880-EKL (N.D. Cal. Jan 28, 2026) (*Concord II*).

1 unauthorized copies of BMG’s copyrighted musical compositions.

2 5. Anthropic then processed this data to remove portions that it did not
3 want to use to train its models, and, in doing so, created new unauthorized copies of
4 BMG’s musical compositions, upon information and belief. This “cleaning”
5 process used extractor tools that removed copyright identifying information—
6 known as Copyright Management Information (“CMI”) under the Copyright Act.

7 6. Anthropic next copied this corpus of text—including BMG’s
8 copyrighted musical compositions that had been pirated by Anthropic—and
9 processed the data through a variety of techniques to train or “encode” its Claude
10 models. This process resulted in the models memorizing the text corpus and
11 mapping out the distance between words so that the model could later predictably
12 reproduce text in human-like response. During this encoding process, and upon
13 information and belief, Anthropic removed any remaining CMI including from
14 BMG’s musical compositions.

15 7. Finally, upon information and belief, Anthropic “finetuned” the
16 Claude models, in part through directing individuals to prompt the models and
17 encourage certain preferred responses, including queries expressly calling for the
18 replication of BMG’s musical compositions. After completing the training process,
19 Claude was then able to generate human-like outputs that resemble both the training
20 data and finetuning processes used by Anthropic.

21 8. In addition to its unauthorized copying of BMG’s copyrighted musical
22 compositions and improper use of these compositions as inputs in training Claude,
23 Anthropic infringed BMG’s compositions through Claude’s outputs. Via Claude,
24 Anthropic reproduced unauthorized copies of and prepared unauthorized derivative
25 works based on the lyrics in BMG’s copyrighted musical compositions in response
26 to user prompts, including prompts directly referring to BMG’s compositions.
27 Anthropic’s Claude generated those illicit copies and prepares unauthorized
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1 derivative works in myriad ways, including, for example and upon information and
2 belief, as text incorporated into other materials in response to user prompts
3 requesting “original” songs.

4 9. Anthropic’s outputs of BMG’s lyrics typically omit CMI, upon
5 information and belief, which also violates BMG’s rights. This is intentional and by
6 design. Because Anthropic strips much of the CMI from the works when it
7 processes the text corpus, it knows that Claude will not have that information
8 memorized and will not generate the CMI as output.

9 10. Anthropic’s infringement goes beyond using BMG’s copyrighted
10 lyrics to train its Claude models and Claude’s outputs. Anthropic unlawfully
11 copied, downloaded, and retained unauthorized copies of pirated texts, including
12 BMG’s copyrighted musical compositions, in a general-purpose central library that
13 Anthropic assembled and intended to maintain on an indefinite basis for its use, as
14 set forth below. To assemble the general-purpose central library, Anthropic
15 engaged in mass torrenting from pirate libraries and a destructive book-scanning
16 program through which Anthropic purchased books, removed their bindings, cut
17 pages, and converted them into digital files. These publicly documented practices
18 are illustrative, not exhaustive. The full extent of Anthropic’s improper actions and
19 the practices employed by Anthropic are uniquely within Anthropic’s knowledge
20 and will be revealed through discovery. Anthropic’s conduct was all directed
21 toward the same objective: obtaining and retaining a comprehensive digital
22 collection of written works for Anthropic’s present and future use. Anthropic’s
23 mass reproduction and retention of these works—without permission and separate
24 from Anthropic’s use of any particular work as input or output related to Claude—
25 constitute separate standalone acts of infringement.

26 11. Anthropic unquestionably benefits financially from its blatant
27 disregard of U.S. copyright law. In May 2026, Anthropic reported raising an
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1 additional \$65 billion in new funding, with a resulting \$965 billion valuation of the
 2 company. On August 25, 2026, *The Wall Street Journal* reported that Anthropic is
 3 expected to tell investors—in advance of its forthcoming initial public offering—
 4 that its potential revenue exceeds \$30 trillion.² Beyond its enterprise value,
 5 Anthropic profits handsomely from its ecosystem of Claude models, as set forth
 6 below. Anthropic has monetized its large language models to both individual end
 7 users and corporate customers. Anthropic has built that success on the ongoing
 8 unauthorized use of numerous copyrighted works, including BMG’s.

9 12. In doing so, Anthropic incorporated BMG’s works, without
 10 permission, into AI models that are anything but uniformly beneficial, as Anthropic
 11 claims. Just recently, Anthropic admitted that two of its Claude models at issue in
 12 this case engaged in hacking activities, conceding that they “gained unauthorized
 13 access to the real systems of three different organizations.”³ And public information
 14 suggests this was not the first time Claude hacked into a third party website without
 15 permission: one user of Claude Opus 4.6 reported that the model hacked into a
 16 gym’s website to remove another gym member from the waitlist for a class so that
 17 the Claude user could gain entry instead.⁴ Thus, despite Anthropic’s extensive PR
 18 campaign to promote its responsible AI models—models built on the backs of
 19 BMG’s and other rightsholders’ works without permission or compensation—the
 20 real world dangers from Anthropic’s models are significant and potentially
 21 calamitous.

22 _____
 23 ² Corrie Driebusch, “Anthropic Expected to Tell Investors It Sees Over \$30 Trillion
 24 in Potential Revenue,” *The Wall Street Journal*,
<https://www.wsj.com/tech/ai/anthropic-expected-to-tell-investors-it-sees-over-30-trillion-in-potential-revenue-a611efea> (Aug. 25, 2026).

25 ³ “Investigating three real-world incidents in our cybersecurity evaluations,”
 26 *Anthropic*, <https://www.anthropic.com/news/investigating-incidents-cybersecurity-evals> (Jul. 30, 2026).

27 ⁴ Julie Bort, “Tech industry is buzzing after a Claude agent hacked into a gym,”
 28 *TechCrunch*, <https://techcrunch.com/2026/08/10/tech-industry-is-buzzing-after-a-claude-agent-hacked-into-a-gym/> (Aug. 10, 2026).

13. Anthropic pays nothing to BMG, its songwriters, or the significant number of other copyright owners Anthropic has illegally exploited to train Claude and create infringing outputs. And BMG has never authorized Anthropic to use its copyrighted compositions in whole or in part in connection with its Claude models. Nor has Anthropic ever attempted to license BMG's copyrighted musical compositions or even engaged in a dialogue with BMG about such uses. Rather, when BMG sent Anthropic a cease-and-desist letter in December 2025, Anthropic never responded.

14. Anthropic's infringement of BMG's lyrics causes significant and irreparable harm to BMG and the songwriters it represents, including those who have written the soundtrack to our lives. Anthropic has profited and continues to profit from its unauthorized use of BMG's copyrighted musical compositions while the authors of these works are left to watch their creative talents exploited without any compensation or acknowledgment. Accordingly, BMG brings this action to enjoin Anthropic's infringement and remedy the significant harm Anthropic has caused BMG and the songwriters it represents.

THE PARTIES

15. BMG is a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York, New York.

16. Anthropic is a Delaware corporation with its principal place of business in San Francisco, California.

JURISDICTION, VENUE, AND DIVISIONAL ASSIGNMENT

17. The Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a) because the claim alleged herein arises under the Copyright Act of 1976, 17 U.S.C. §§ 101 *et seq.*

18. Venue is proper in this District under 28 U.S.C. §§ 1391(b) and/or 1400 because Anthropic resides or may be found in this District; because Anthropic

1 conducts, transacts, and solicits business in this District; and because a substantial
2 part of the events or omissions giving rise to the claim occurred in this District.

3 19. Anthropic is subject to personal jurisdiction in the State of California
4 because it is headquartered in the State and does systematic and continuous
5 business in the State; because the claims herein relate to or arise out of infringing
6 activities that Anthropic purposefully directed toward or conducted in the State; and
7 because the exercise of personal jurisdiction over Anthropic is just and reasonable.

8 **FACTUAL BACKGROUND**

9 **I. BMG AND ITS COPYRIGHTS**

10 20. BMG, founded in 2008, has risen to be the fourth-largest music
11 company in the world and a trusted partner for songwriters throughout their careers.
12 BMG has partnered with some of the most notable songwriters today to those just
13 beginning their career in music.

14 21. BMG owns or controls, in whole or in part, exclusive rights to nearly
15 four million musical compositions, from the most well-known, chart-topping hits to
16 the imaginative works of up-and-coming composers and lyricists. BMG represents
17 and advocates for thousands of songwriters who have helped create those works.
18 BMG knows that great music starts with great songwriting, and is committed to
19 supporting and protecting the creative works its songwriters have entrusted to it.

20 22. As a publisher, BMG regularly enters into licenses and other
21 agreements for the works it owns, through which BMG compensates its songwriters
22 for their share of earnings. BMG's songwriters rely on the income received from
23 these transactions to support their livelihood and art. This system of licensing,
24 permissions, and authorized use is the backbone of the music publishing industry,
25 and ensures that the songwriters and publishers who have invested in developing
26 creative works receive compensation for the use of these works.

27 23. U.S. copyright law is not an "opt out" system in which technology
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1 platforms like Anthropic have the right to infringe first and wait for artists and
2 rightsholders to object. Indeed, BMG and its songwriters rely on U.S. copyright law
3 to protect their works from infringement. Without such protections, the music
4 publishing industry as we know it could not function because songwriters would be
5 unable to profit from their work, and because publishers like BMG would lack the
6 financial ability and incentive to invest in the careers and promote the works of
7 their songwriters.

8 24. When BMG licenses its copyrighted lyrics, its licensees, including
9 lyrics aggregator websites, ordinarily provide the corresponding song title,
10 songwriter(s), and other identifying information. Such copyright management
11 information is essential for informing consumers about the authors of musical
12 works including so they know where to find more of the music they enjoy. It also
13 serves as a key protection for authors and publishers by ensuring that they receive
14 credit for their creative works, and that the works enjoy copyright protection. Any
15 removal or alteration of CMI by unlicensed parties violates these rights and harms
16 the interests of BMG and its songwriters. It also violates the Copyright Act.

17 25. BMG owns or controls, in whole or in part, exclusive rights to millions
18 of valuable musical compositions pursuant to contracts with songwriters and other
19 rightsholders. Those works include the compositions listed in Exhibits A and B,
20 which are non-exhaustive, exemplary lists of musical compositions in which BMG,
21 in whole or in part, owns or, as an exclusive licensee, controls the U.S. copyright,
22 and that Anthropic has infringed.

23 26. Each work listed in Exhibits A and B constitutes an original work or
24 copyrightable subject matter under the Copyright Act, 17 U.S.C. § 101 *et seq.*,
25 which has been registered with the U.S. Copyright Office. The copyrights for each
26 of the musical compositions in Exhibits A and B remain valid and subsisting, and
27 have been owned and/or controlled by BMG, in whole or in part, at all times
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1 relevant to the allegations in this Complaint.

2 **II. ANTHROPIC AND ITS ILLEGAL CONDUCT**

3 **A. Anthropic's Founding and Development of its Claude LLMs**

4 27. Founded in 2021 by a group of former OpenAI executives, Anthropic
5 is a corporation that develops, operates, sells, and licenses AI programs. Anthropic
6 announced in May 2026 that it is valued at \$965 billion⁵—a fortune built on stolen
7 copyrighted works, including those owned by BMG. Anthropic bills itself as an AI
8 safety and research company, and claims that “[s]haping the future of AI . . . is a
9 responsibility and a privilege.”⁶ But Anthropic’s platitudes are at odds with its
10 unlawful actions. Anthropic developed its products from unlicensed musical works,
11 regurgitates those same works to the public without credit, and has categorically
12 refused to compensate their legal owners.

13 28. Anthropic’s primary products are its AI models known as Claude, a
14 series of general-purpose large language models (“LLMs”). LLMs are computer
15 models designed to comprehend and generate natural human language text.
16 Anthropic develops the models by feeding an enormous amount of text inputs,
17 including BMG’s musical compositions, into the models in a process commonly
18 referred to as “training”. Claude is then able to recognize user text prompts and
19 queries, and to generate output responses in a conversational format resembling
20 human writing, based on the text and other data on which the models were trained.

21 29. The more material on which an LLM is trained, the better it performs.
22 AI companies like Anthropic therefore have engaged in a race to vacuum up as
23 much existing content as possible in order to make their LLMs as powerful and
24 capable as possible. Such companies are incentivized to run roughshod over the

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26 ⁵ “Anthropic raises \$65B in Series H funding at \$965B post-money valuation,”
Anthropic, <https://www.anthropic.com/news/series-h> (May 28, 2026).

27 ⁶ “Making AI systems you can rely on,” *Anthropic*,
28 <https://www.anthropic.com/company> (last accessed Mar. 16, 2026).

1 rights of the owners of such content because, they believe, they will fall behind in
2 the AI arms race if they do not and will not be able to attract eye-watering
3 valuations.

4 30. Anthropic began developing and training its Claude models as early as
5 February 2021, and released a series of LLMs beginning in 2022, first to certain
6 limited business partners, and then in 2023, to the wider public. Soon thereafter,
7 Anthropic released additional versions of the Claude model, and has continued to
8 release new Claude models, including four new models in June and July of this
9 year, all the while, upon information and belief, training each of its models on a
10 newly copied training corpus with unlicensed copyrighted works, including those
11 owned by BMG.

12 31. To train Claude, Anthropic first copies an enormous volume of text
13 from the Internet, as well as other sources like scanned books. Anthropic uses
14 several methods to collect text from Internet sources, including automated tools like
15 web crawlers that copy and download text and data to Anthropic's servers (a
16 process called "scraping"), and torrenting through the BitTorrent protocol from
17 illegal online pirate libraries, including Library Genesis ("LibGen") and Pirate
18 Library Mirror ("PiLiMi"), among others. These massive collections of text
19 downloaded by Anthropic include copies of BMG's copyrighted musical
20 compositions.

21 32. Next, Anthropic processes the downloaded text to "clean" or remove
22 portions that it does not want used to train its Claude models. This cleaning process
23 employs extractor tools that remove copyright notices and other CMI identifying
24 copyrighted materials, its authors and owners, among other details, including, upon
25 information and belief, for BMG's musical compositions. For example, publicly
26 available information indicates that Anthropic tested and used at least three
27 different extraction programs—including Readability, Newspaper, and jusText—to
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1 remove text from the footers of documents where CMI usually appears. Upon
 2 information and belief, Anthropic determined that jusText did not do a good
 3 enough job to remove CMI from a scraped Internet page as Anthropic wanted,
 4 leaving in what it called “useless junk” or “boilerplate”.⁷ Anthropic believed
 5 Newspaper did a better job removing CMI, including footnotes containing
 6 identifying information, copyright owner names, and copyright notices. Upon
 7 information and belief, based on Newspaper’s superior CMI removal abilities,
 8 Anthropic intentionally deployed and continues to use this tool to remove CMI
 9 from documents in its training corpuses, including BMG’s copyrighted musical
 10 compositions.

11 33. Anthropic then copies this corpus of text, including BMG’s
 12 copyrighted musical compositions, and processes the data through a variety of
 13 techniques to train its Claude models and/or establish the value of parameters that
 14 form the models. That process involves “encoding”, a method by which Anthropic
 15 breaks down and converts text into “tokens”—words or portions of words—for
 16 storage. Anthropic then translates the tokens into “vectors”, which are a sequence
 17 of numbers used to recognize each token in the models’ algorithms. Anthropic
 18 calculates the vectors based on each token’s proximity to other tokens in the
 19 training corpus, *i.e.*, a calculation of how close words appear to other specific
 20 words, revealing to the model words with similar meanings and uses. Upon
 21 information and belief, during this encoding process Anthropic removes any
 22 remaining CMI, including for BMG’s musical compositions.

23 34. Finally, Anthropic “finetunes” the Claude models through
 24 “reinforcement learning” using human and AI feedback, a process that can include
 25 further copying of the training corpus, including BMG’s compositions. As part of
 26 this process, Anthropic hires and directs humans to enter prompts into Claude to

27 ⁷ See *Concord I*, Dkt. No. 419-1 at ¶ 7.
 28

1 encourage outputs that align with Anthropic’s goals for the algorithm. Upon
 2 information and belief, such human prompts included queries expressly calling for
 3 the replication of BMG’s copyrighted text. The finetuning process also includes the
 4 further use of input training sets to adjust the models’ values.

5 35. After completing the training process, Claude is able to generate
 6 human-like outputs that resemble the syntax, character and text of Anthropic’s
 7 training corpus and finetuning processes.

8 **B. Anthropic’s Improper and Infringing Conduct**

9 36. Anthropic infringes BMG’s copyrights and violates the Copyright Act
 10 in multiple ways, including at least the following:

11 **i. Anthropic’s Infringement by Training**

12 37. Anthropic has infringed BMG’s copyrights in the training of its AI
 13 models. Anthropic creates and uses unauthorized copies of BMG’s copyrighted
 14 musical compositions in order to develop training sets for and to train Claude.

15 38. As described above, the training process for Claude involves the use of
 16 an enormous amount of text to amass a training corpus, which includes copyrighted
 17 compositions owned by BMG that Anthropic scraped, downloaded, or took by
 18 other means from publicly available and/or pirated sources on the Internet.

19 39. While Anthropic has closely guarded the specific sources of text that it
 20 uses to train Claude, the company has admitted that it trains its Claude models on
 21 “a proprietary mix of publicly available information on the Internet” and “non-
 22 public data from third parties, data provided by data labeling services and paid
 23 contractors, and data [it] generate[s] internally.”⁸ Most recently, Anthropic admitted
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25 ⁸ See, e.g., *Claude 3.7 Sonnet System Card*, Anthropic (Feb. 25, 2025),
 26 [https://assets.anthropic.com/m/785e231869ea8b3b/original/claude-3-7-sonnet-](https://assets.anthropic.com/m/785e231869ea8b3b/original/claude-3-7-sonnet-system-card.pdf)
 27 [system-card.pdf](https://assets.anthropic.com/m/785e231869ea8b3b/original/claude-3-7-sonnet-system-card.pdf); see also *The Claude 3 Model Family: Opus, Sonnet, Haiku*, at 3,
 28 Anthropic, [https://assets.anthropic.com/m/61e7d27f8c8f5919/original/Claude-3-](https://assets.anthropic.com/m/61e7d27f8c8f5919/original/Claude-3-Model-Card.pdf)
[Model-Card.pdf](https://assets.anthropic.com/m/61e7d27f8c8f5919/original/Claude-3-Model-Card.pdf); *Model Card and Evaluations for Claude Models*, at 2, Anthropic,
<https://www->

1 that it trained its new Claude Opus 5 model, released on July 24, 2026, Claude
 2 Sonnet 5 model, released on June 30, 2026, and its Claude Fable 5 and Claude
 3 Mythos 5 models, released on June 9, 2026, on “a proprietary mix of publicly
 4 available information from the Internet, public and private datasets, and synthetic
 5 data generated by other models.”⁹ Anthropic refuses to disclose the specific mix of
 6 training data and its sources in an effort to conceal its knowing copying of
 7 copyrighted materials, including copyrighted musical compositions owned by
 8 BMG, without permission and its knowing illegal removal of CMI for such works.

9 40. That Claude has been capable of generating and has generated outputs
 10 of nearly exact replicas of BMG’s lyrics in response to prompts shows that
 11 Anthropic trained Claude on BMG’s copyrighted musical compositions. But for
 12 Anthropic’s copying and use of those compositions’ lyrics to train its AI models,
 13 Claude could not recite copies of BMG’s works as outputs. For example and upon
 14 information and belief, Claude users have requested the lyrics to and received
 15 output from Claude containing all or significant portions of lyrics from BMG-
 16 owned or controlled musical compositions, including “7 Rings”, “Kickstart My
 17 Heart”, “You Can’t Always Get What You Want”, and “Uptown Funk”.

18 41. One source of text that Anthropic has admitted that it has used for its
 19

20 [cdn.anthropic.com/5c49cc247484cecf107c699baf29250302e5da70/claude-2-](https://cdn.anthropic.com/5c49cc247484cecf107c699baf29250302e5da70/claude-2-model-card.pdf)
 21 [model-card.pdf](https://cdn.anthropic.com/5c49cc247484cecf107c699baf29250302e5da70/claude-2-model-card.pdf).

22 ⁹ *System Card: Claude Opus 5*, at 10, Anthropic (Jul. 24, 2026), [https://www-](https://www-cdn.anthropic.com/b514064af1408018e64b1ad24e7d5e75850b4ffd/Claude%20Opus%205%20System%20Card.pdf)
 23 [cdn.anthropic.com/b514064af1408018e64b1ad24e7d5e75850b4ffd/Claude%20Opus%205%20System%20Card.pdf](https://www-cdn.anthropic.com/b514064af1408018e64b1ad24e7d5e75850b4ffd/Claude%20Opus%205%20System%20Card.pdf); *System Card: Claude Sonnet 5*, at 9, Anthropic
 24 (Jun. 30, 2026), [https://www-](https://www-cdn.anthropic.com/283ef97c476cf442c91d9a37d5b214242a55bb92/Claude%20Sonnet%205%20System%20Card.pdf)
 25 [cdn.anthropic.com/283ef97c476cf442c91d9a37d5b214242a55bb92/Claude%20Sonnet%205%20System%20Card.pdf](https://www-cdn.anthropic.com/283ef97c476cf442c91d9a37d5b214242a55bb92/Claude%20Sonnet%205%20System%20Card.pdf); *System Card: Claude Fable 5 & Claude Mythos 5*, at 12, Anthropic (Jun. 9, 2026), [https://www-](https://www-cdn.anthropic.com/57a52ea7d8f0e54e8a542e908266086df425cdf5/Claude%20Fable%205%20&%20Claude%20Mythos%205%20System%20Card.pdf)
 26 [cdn.anthropic.com/57a52ea7d8f0e54e8a542e908266086df425cdf5/Claude%20Fable%205%20&%20Claude%20Mythos%205%20System%20Card.pdf](https://www-cdn.anthropic.com/57a52ea7d8f0e54e8a542e908266086df425cdf5/Claude%20Fable%205%20&%20Claude%20Mythos%205%20System%20Card.pdf); *see also*
 27 *System Card: Claude Haiku 4.5*, at 5, Anthropic (Oct. 2025), [https://www-](https://www-cdn.anthropic.com/7aad69bf12627d42234e01ee7c36305dc2f6a970.pdf)
 28 [cdn.anthropic.com/7aad69bf12627d42234e01ee7c36305dc2f6a970.pdf](https://www-cdn.anthropic.com/7aad69bf12627d42234e01ee7c36305dc2f6a970.pdf) (stating similar training bases for Anthropic’s Claude Haiku 4.5 model, released October 15, 2025).

1 training sets is the “Common Crawl” dataset.¹⁰ Anthropic Co-Founder Benjamin
 2 Mann admitted during his deposition in *Concord I* that “[e]very commercial
 3 Anthropic model uses data from Common Crawl” and that as of November 20,
 4 2025, “Anthropic [was] still using data derived from Common Crawl’s data to train
 5 models.”¹¹ Upon information and belief, the Common Crawl dataset included
 6 BMG’s copyrighted lyrics that were scraped from the Internet, including from
 7 websites maintained by BMG’s licensees authorized to display BMG’s copyrighted
 8 lyrics at the time Anthropic downloaded and utilized Common Crawl datasets to
 9 train its Claude models.¹²

10 42. Anthropic has also admitted that it downloaded and used a dataset
 11 called “The Pile” to train its Claude models.¹³ The Pile is a dataset “designed for
 12 training large scale language models,” and comprised of various pre-existing “high-
 13 quality datasets,” including the Books3 dataset.¹⁴ The Books3 dataset is well known

14
 15 ¹⁰ See Amanda Askell *et al.*, *A General Language Assistant as Laboratory for*
 16 *Alignment*, 8, 27, Anthropic (Dec. 9, 2021), <https://arxiv.org/pdf/2112.00861>;
 Declaration of Timothy Chung in Support of Plaintiffs’ Motion for Partial
 Summary Judgment, Exhibit 5, Deposition Transcript of Benjamin Mann, at 39:15-
 41:21, *Concord I* (Dkt. No. 595-5).

17
 18 ¹¹ Declaration of Timothy Chung in Support of Plaintiffs’ Motion for Partial
 Summary Judgment, Exhibit 5, Deposition Transcript of Benjamin Mann, at 39:15-
 41:21, *Concord I* (Dkt. No. 595-5).

19
 20 ¹² Kevin Schaul *et al.*, *Inside the secret list of websites that make AI like ChatGPT*
sound smart, Washington Post (Apr. 12, 2023),
 21 <https://www.washingtonpost.com/technology/interactive/2023/ai-chatbot-learning/>.

22 ¹³ Declaration of Collin Fredricks in Support of Plaintiffs’ Opposition to
 Anthropic’s Motion for Summary Judgment, Exhibit 6, Anthropic PBC’s
 Objections and Responses to Plaintiffs’ Fourth Set of Interrogatories, *Bartz* (Dkt.
 23 No. 554-6); Anthropic PBC’s Answer to First Amended Class Action Complaint, at
 ¶ 57, *Bartz* (Dkt. No. 72) (“Anthropic admits that it has used portions of the Pile in
 24 connection with the training of certain Claude models.”); *see also* Annie Gilbertson
 25 *et al.*, *Apple, Nvidia, Anthropic Used Thousands of Swiped YouTube Videos to*
Train AI, Proof (Jul. 16, 2024), [https://www.proofnews.org/apple-nvidia-anthropic-](https://www.proofnews.org/apple-nvidia-anthropic-used-thousands-of-swiped-youtube-videos-to-train-ai/)
 26 [used-thousands-of-swiped-youtube-videos-to-train-ai/](https://www.proofnews.org/apple-nvidia-anthropic-used-thousands-of-swiped-youtube-videos-to-train-ai/) (stating that Anthropic
 trained models on the Pile).

27 ¹⁴ Leo Gao *et al.*, *The Pile: An 800GB Dataset of Diverse Text for Language*
 28 *Modeling*, 2, ARXIV (Dec. 31, 2020), <https://arxiv.org/pdf/2101.00027>.

1 to be comprised of hundreds of thousands of pirated books obtained through
 2 torrenting and, upon information and belief, contains BMG's works, including, by
 3 way of example, "You Can't Always Get What You Want" through the book
 4 *Rolling Stones - Sheet Music Anthology*, and "Beauty And A Beat", through *Justin*
 5 *Bieber - Believe (songbook)*, among others.¹⁵ The Pile also includes a dataset of
 6 "YouTube Subtitles," comprised of "all human generated closed captions" for
 7 173,651 YouTube videos, which likewise contains the lyrics of BMG works,
 8 including "7 Rings" and "Rain On Me."¹⁶

9 43. Upon information and belief, Anthropic copied both the Common
 10 Crawl and The Pile datasets and processed the information for use in its own
 11 training data. During that processing, Anthropic intentionally used extraction
 12 algorithms to remove or alter CMI accompanying BMG's lyrics, including the
 13 copyright notice, copyright owner names, songwriter credits, performing artist
 14 name, and song title. The contents of The Pile and the Common Crawl datasets are
 15 publicly known and, therefore, Anthropic knew or should have known that when it
 16 copied those datasets that they included BMG's copyrighted works and associated
 17 CMI.

18 44. Upon information and belief, Anthropic also built its training corpus
 19 for Claude from information that Anthropic itself scraped and copied from the
 20 Internet without permission, including from BMG's licensees that were authorized
 21 to publish copies of BMG's works, such as MusixMatch.com and LyricFind.com,
 22 and containing BMG's works.

23
 24 ¹⁵ See Alex Reisner, *Revealed: The Authors Whose Pirated Books Are Powering*
 25 *Generative AI*, The Atlantic (Aug. 19, 2023),
 26 <https://www.theatlantic.com/technology/archive/2023/08/books3-ai-meta-llama-pirated-books/675063/>; *AI Watchdog: Books3*, The Atlantic (Sept. 10, 2025),
 27 <https://www.theatlantic.com/technology/archive/2025/09/dataset-books3/683662/>.

28 ¹⁶ Leo Gao, *supra*; Annie Gilbertson, *supra*; Alex Reisner, *Search the YouTube*
Videos Secretly Powering Generative AI, Proof (Jul.16, 2024),
<https://www.proofnews.org/youtube-ai-search/>.

45. Anthropic also obtained copies of books for use as training data, and for other purposes, through a book-scanning program led by the former leader of Google’s book-scanning program, Tom Turvey, whom Anthropic tasked with “obtaining ‘all the books in the world.’”¹⁷ At Anthropic, after briefly pursuing a plan to obtain copies of properly licensed books from publishers, Turvey let those conversations with publishers “wither,” and instead began a program to purchase millions of print books for digitization.¹⁸ Upon purchasing these books, Anthropic, through third-party service providers, stripped them of their bindings, cut their pages to size, and scanned them into digital form. Through this process, Anthropic created unauthorized PDF copies of each of those print books containing images of the scanned pages with machine readable text, which, upon information and belief, included numerous songbooks and sheet music collections containing BMG’s works, among others. While Anthropic may have modeled its book digitization program on Google’s, its motives bore little resemblance. Unlike Google’s effort to create a not-for-profit searchable database that allows the broader public to discover books of interest, Anthropic created these unauthorized scanned copies of books to further its own valuation and profits through AI training and other unauthorized uses.

ii. **Anthropic’s Further Pre-Training and Training Infringement**

46. Anthropic made and makes additional copies of BMG’s copyrighted lyrics, without permission, when it cleans, processes, trains with, encodes with, and/or finetunes the data input into Claude models, further violating BMG’s

¹⁷ See *Bartz v. Anthropic PBC*, 787 F. Supp. 3d 1007, 1015-16 (N.D. Cal. 2025); Aaron Schaffer, *et al.*, *Inside an AI start-up’s plan to scan and dispose of millions of books*, The Washington Post (Jan. 27, 2026), <https://www.washingtonpost.com/technology/2026/01/27/anthropic-ai-scan-destroy-books/>.

¹⁸ *Bartz*, 787 F. Supp. 3d at 1015-16.

1 copyrights.

2 47. During the cleaning phase of preparing the text corpus for use in
3 training—a process that involves stripping unwanted text like BMG’s CMI—
4 Anthropic creates additional copies of BMG’s works. Anthropic then creates more
5 copies of this resulting text corpus, still including BMG’s copyrighted works, when
6 it encodes the Claude models. Anthropic makes further unauthorized copies when it
7 finetunes the Claude models, as described above.

8 **iii. Anthropic’s Infringement via Torrenting, BitTorrent and**
9 **Central Library**

10 48. Anthropic made unauthorized copies of BMG’s works via BitTorrent,
11 both by downloading and uploading BMG-owned works. As revealed in 2025 in
12 another lawsuit against Anthropic,¹⁹ Anthropic downloaded, without the permission
13 of copyright owners, millions of copies of copyrighted books via torrenting, using
14 the BitTorrent protocol, from illegal pirate library sites. These files included books,
15 songbooks, and sheet music that contain BMG’s copyrighted works and that
16 Anthropic used for its training sets, among other uses, as set forth below. Anthropic
17 used torrenting to obtain these files, instead of properly licensing copyrighted
18 works, to avoid a “legal/practice/business slog,” according to Anthropic co-founder
19 and CEO Dario Amodei.²⁰

20 49. Anthropic’s illegal torrenting from online pirate libraries—also
21 referred to as shadow libraries—included, but was not limited to, an Anthropic co-
22 founder’s downloading and copying at least 196,640 copies of copyrighted books
23 from the Books3 shadow library, in early 2021; an Anthropic co-founder’s use of
24 BitTorrent to download and copy at least five million copies of copyrighted books
25 from the LibGen shadow library, in June 2022; and Anthropic’s downloading and

26 ¹⁹ *See Bartz v. Anthropic PBC*, 791 F. Supp. 3d 1038, 1046 (N.D. Cal. 2025).

27 ²⁰ *Bartz*, 787 F. Supp. 3d at 1015–16, 1026.

1 copying through torrenting of at least two million other copies of copyrighted books
2 from the PiLiMi shadow library, in July 2022, all without the permission of the
3 copyright owners.²¹

4 50. BitTorrent is a peer-to-peer file sharing protocol that its users employ
5 to make unauthorized copies of and to unlawfully distribute and receive
6 copyrighted content. BitTorrent operates by breaking files into multiple pieces for
7 immediate and simultaneous distribution between multiple users. Once users
8 download one of those pieces, they instantaneously begin to distribute copies of
9 that file to other BitTorrent users. As such, when Anthropic downloaded copies of
10 pirated books and texts, Anthropic simultaneously uploaded to other BitTorrent
11 users numerous additional unauthorized copies of the same books and texts
12 containing BMG's copyrighted works, thereby making additional copies of BMG's
13 works and infringing them in multiple ways. This, in and of itself, represents a
14 further and separate violation of rights that BMG holds in its copyrighted works,
15 apart from Anthropic using the results of torrenting for training its Claude models
16 and other purposes.

17 51. Anthropic copied and retained a set of the torrented pirated works, as
18 well as the works it obtained from other sources such as The Pile and scanned
19 versions of print works, in a general-purpose central library independent from its
20 training of Claude.²² Anthropic intended to keep this central library forever, for use
21 for any future purpose.²³ Upon information and belief, Anthropic maintained and
22 stored copies of these files in the central library in the same format as they had
23 originally torrented or otherwise obtained them. Anthropic exploited this central
24 library of pirated works for several purposes, one of which was to develop its

25 ²¹ *Bartz*, 791 F. Supp. 3d at 1046.

26 ²² *Bartz*, 787 F. Supp. 3d at 1016.

27 ²³ *Bartz*, 791 F. Supp. 3d at 1047.

28

1 commercial products, including Claude. Anthropic never paid for or obtained
2 consent from copyright owners, including BMG, to develop its library of stolen
3 works.

4 52. In furtherance of the same effort to create a comprehensive, general-
5 purpose library, Anthropic also purchased millions of print books and engaged in
6 efforts to strip the books of their bindings, cut them apart, and scan those books into
7 digital files. Anthropic thus used at least two complementary methods to acquire
8 books on a massive scale by unlawfully torrenting millions of digital books from
9 pirate libraries and converting millions of physical books into digital copies through
10 destructive scanning to add to its retained library.

11 53. Upon information and belief, Anthropic chose certain, but not all,
12 written works from this central library (which is at least comprised of torrented
13 book files and destructively scanned physical books) to include in the text dataset
14 that it used to train its Claude models. Notwithstanding any later use of those works
15 for Claude training purposes, Anthropic retained pirated copies of those works as
16 part of its central library with the intent to store them “forever.”²⁴ Anthropic’s
17 actions in this regard constitute further independent, separate acts of infringement.

18 54. For example, and upon information and belief, BMG’s works that
19 Anthropic improperly torrented include copyrighted musical compositions such as
20 “Rain on Me”, “Sympathy for the Devil”, and “Grenade”.

21 55. Discovery will demonstrate the full extent of Anthropic’s improper
22 torrenting, copying, and storage of BMG’s copyrighted works in the foregoing
23 infringing activities.

24 **iv. Anthropic’s Infringing Outputs**

25 56. Anthropic has infringed BMG’s copyrighted musical compositions
26 through Claude’s outputs, including outputs comprised of nearly identical or

27 ²⁴ *Bartz*, 787 F. Supp. 3d at 1016.
28

1 substantially similar copies of BMG’s lyrics, in whole or in part, without Anthropic
 2 having obtained consent to produce any such copies and/or any derivative works
 3 based on such compositions.

4 57. Upon information and belief, numerous third-party users have
 5 prompted Claude with respect to such BMG-owned lyrics and, in response,
 6 received outputs copying those lyrics, without BMG’s authorization and in
 7 violation of its copyrights.

8 58. For example, one of BMG’s co-owned copyrighted musical
 9 compositions is “Sympathy for the Devil” by The Rolling Stones. When prompted
 10 for “the lyrics to sympathy for the devil by the rolling stones,” Claude generated a
 11 substantially similar response containing large portions of the copyrighted lyrics,
 12 thereby violating BMG’s rights:

<u>“Sympathy for the Devil” Lyrics</u>	<u>Claude’s Output</u>
13 ... 14 15 16 Please allow me to introduce myself 17 I'm a man of wealth and taste 18 I've been around for a long, long year 19 Stole many a man's soul and faith 20 And I was 'round when Jesus Christ 21 Had his moment of doubt and pain 22 Made damn sure that Pilate 23 Washed his hands and sealed his fate 24 25 Pleased to meet you 26 Hope you guess my name 27 But what's puzzling you 28 Is the nature of my game Stuck around St. Petersburg When I saw it was a time for a change Killed the Czar and his ministers Anastasia screamed in vain I rode a tank, held a general's rank When the Blitzkrieg raged and the bodies stank	Here are the lyrics to “Sympathy for the Devil” by The Rolling Stones: Please allow me to introduce myself I'm a man of wealth and taste I've been around for a long, long year Stole many a man's soul to waste And I was 'round when Jesus Christ Had his moment of doubt and pain Made damn sure that Pilate Washed his hands and sealed his fate Pleased to meet you Hope you guess my name But what's puzzling you Is the nature of my game I stuck around St. Petersburg When I saw it was a time for a change Killed the czar and his ministers Anastasia screamed in vain

1 2 3 4	Pleased to meet you Hope you guess my name Oh, yeah Ah, what's puzzling you Is the nature of my game Oh, yeah	I rode a tank Held a general's rank When the blitzkrieg raged And the bodies stank
5 6 7 8 9	I watched with glee while your kings and queens Fought for ten decades for the gods they made I shouted out, "Who killed the Kennedys?" Well, after all, it was you and me Let me please introduce myself I'm a man of wealth and taste And I laid traps for troubadours Who get killed before they reach Bombay	Pleased to meet you Hope you guess my name, oh yeah Ah, what's puzzling you Is the nature of my game, oh yeah
10 11 12	Pleased to meet you Hope you guess my name Oh, yeah But what's puzzling you	I watched with glee While your kings and queens Fought for ten decades For the gods they made
13 14 15 16		I shouted out, "Who killed the Kennedys?" When after all It was you and me
17 18		Let me please introduce myself I'm a man of wealth and taste And I laid traps for troubadours Who get killed before they reached Bombay
		Pleased to meet you Hope you guessed my name, oh yeah But what's puzzling you

59. Another copyrighted musical composition co-owned by BMG is "Sign of the Times" by Harry Styles. Anthropic likewise violated BMG's rights in respect to this musical composition. When asked, "what are the lyrics to sign of the times by harry styles," Claude, again, generated a substantially similar response containing large portions of the copyrighted lyrics:

<u>"Sign of the Times" Lyrics</u>	<u>Claude's Output</u>
... Just stop your crying It's a sign of the times	Here are the lyrics to Sign of the Times by Harry Styles:

1	We gotta get away from here	Just stop your crying, it's a sign of the
2	We gotta get away from here	times
3	Just stop your crying	We gotta get away from here
4	It'll be alright	We gotta get away from here
5	They told me that the end is near	Just stop your crying, it'll be alright
6	We gotta get away from here	They told me that the end is near
7		We gotta get away from here
8	Just stop your crying	
9	Have the time of your life	Just stop your crying, have the time of
10	Breaking through the atmosphere	your life
11	And things are pretty good from here	Breaking through the atmosphere
12	Remember everything will be alright	And things are pretty good from here
13	We can meet again somewhere	Remember, everything will be alright
14	Somewhere far away from here	We can meet again somewhere
15		Somewhere far away from here
16	...	
17	Just stop your crying	We've got to get away from here
18	It's a sign of the times	We've got to get away from here
19	We gotta get away from here	Just stop your crying, it's a sign of the
20	We gotta get away from here	times
21		We gotta get away from here
22	Stop your crying	We got to get away from here
23	Baby, it'll be alright	
24	They told me that the end is near	Just stop your crying, baby, it will be
25	We gotta get away from here	alright
26		They told me that the end is near
27	...	We gotta get away from here
28	Stop your crying, baby	
29	It's a sign of the times	We've got to get away, we've got to get
30	We gotta get away	away
31	We got to get away	We've got to get away from here
32	We got to get away	Just stop your crying, it's a sign of the
33	We got to get away	times
34	We got to, we got to, away	We've got to get away from here
35	We got to, we got to, away	We've got to get away from here
36	We got to, we got to, away	
37		We've got to get away, we've got to get
38		away
39		We've got to get away from here

60. In another instance, when prompted “What are the lyrics to our lips are sealed by go-go’s”—yet another copyrighted work co-owned by BMG— Claude generated the following output, an almost identical recitation of the song’s original lyrics:

	<u>“Our Lips Are Sealed” Lyrics</u>	<u>Claude’s Output</u>
1		
2		
3		Here are the lyrics to the song “Our Lips
4		Are Sealed” by The Go-Go’s:
5	Can you hear them?	Can you hear them
6	They talk about us	They talk about us
7	Telling lies	Telling lies
8	Well, that's no surprise	Well that’s no surprise
9		Can you see them
10	Can you see them?	See right through them
11	See right through them	They have no shield
12	They have no shield	No secrets to reveal
13	No secrets to reveal	
14		It doesn’t matter what they say
15	It doesn’t matter what they say	In the jealous games people play
16	In the jealous games people play	Our lips are sealed
17	Our lips are sealed	There’s a weapon
18		That we must use
19	There’s a weapon	In our defense
20	That we must use	Silence reveals
21	In our defense	
22	Silence reveals	When you look at them
23		Look right through them
24	When you look at them	That’s when they’ll disappear
25	Look right through them	That’s when you’ll be feared
26	That’s when they’ll disappear	
27	That’s when we’ll be feared	It doesn’t matter what they say
28		In the jealous games people play
	It doesn’t matter what they say	Our lips are sealed
	In the jealous games people play	Pay no mind to what they say
	Our lips are sealed	It doesn’t matter anyway
		Our lips are sealed
	Pay no mind to what they say	
	It doesn’t matter anyway	Hush my darling
	Our lips are sealed	Don’t you cry
		Quiet angel
	Hush, my darling	Forget their lies
	Don’t you cry	
	Quiet, angel	Can you hear them
	Forget their lies	They talk about us
		Telling lies
	Can you hear them?	Well that’s no surprise
	They talk about us	
	Telling lies	Can you see them
	Well, that's no surprise	See right through them

1 2 3 4 5 6 7 8 9	Can you see them? See right through them They have no shield No secrets to reveal It doesn't matter what they say In the jealous games people play Our lips are sealed Pay no mind to what they say It doesn't matter anyway Our lips are sealed Our lips are sealed Our lips are sealed	They have no shield No secrets to reveal It doesn't matter what they say In the jealous games people play Our lips are sealed Pay no mind to what they say It doesn't matter anyway Our lips are sealed Our lips are sealed
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61. Another example pertains to BMG's co-owned and copyrighted work "7 Rings" by Ariana Grande. In response to the question, "what are the lyrics to 7 rings by ariana grande," Claude generated the following output, containing lyrics that are almost a verbatim copy of the song's original lyrics:

<u>"7 Rings" Lyrics</u>	<u>Claude's Output</u>
Yeah, breakfast at Tiffany's and bottles of bubbles Girls with tattoos who like getting in trouble Lashes and diamonds, ATM machines Buy myself all of my favorite things (yeah) Been through some bad shit, I should be a sad bitch Who woulda thought it'd turn me to a savage? Rather be tied up with calls and not strings Write my own checks like I write what I sing, yeah (yeah) My wrist, stop watchin', my neck is flossy Make big deposits, my gloss is poppin' You like my hair? Gee, thanks, just bought it I see it, I like it, I want it, I got it (yeah) I want it, I got it, I want it, I got it	Here are the lyrics to 7 Rings by Ariana Grande: Yeah, breakfast at Tiffany's and bottles of bubbles Girls with tattoos who like getting in trouble Lashes and diamonds, ATM machines Buy myself all of my favorite things (yeah) Been through some bad shit, I should be a sad bitch Who would have thought it'd turn me to a savage? Rather be tied up with calls and not strings Write my own checks like I write what I sing, yeah (yeah) My wrist, stop watchin', my neck is flossin' Make big deposits, my gloss is poppin' You like my hair? Gee, thanks, just bought it I see it, I like it, I want it, I got it (yeah) I want it, I got it, I want it, I got it

1	I want it, I got it, I want it, I got it	I want it, I got it, I want it, I got it
2	You like my hair? Gee, thanks, just bought it	You like my hair? Gee, thanks, just bought it
3	I see it, I like it, I want it, I got it (yeah)	I see it, I like it, I want it, I got it (yeah)
4	Wearing a ring, but ain't gon' be no "Mrs."	Wearing a ring, but ain't gon' be no "Mrs."
5	Bought matching diamonds for six of my bitches	Bought matching diamonds for six of my bitches
6	I'd rather spoil all my friends with my riches	I'd rather spoil all my friends with my riches
7	Think retail therapy my new addiction	Think retail therapy my new addiction
8	Whoever said money can't solve your problems	Whoever said money can't solve your problems
9	Must not have had enough money to solve 'em	Must not have had enough money to solve 'em
10	They say, "Which one?" I say, "Nah, I want all of 'em"	They say, "Which one?" I say, "Nah, I want all 'em"
11	Happiness is the same price as red bottoms	Happiness is the same price as red-bottoms
12	My smile is beamin', my skin is gleamin'	My smile is beamin', my skin is gleamin'
13	The way it shine, I know you've seen it (you've seen it)	The way it shine, I know you've seen it (you've seen it)
14	I bought a crib just for the closet	I bought a crib just for the closet
15	Both his and hers, I want it, I got it, yeah	Both his and hers, I want it, I got it, yeah
16	I want it, I got it, I want it, I got it	I want it, I got it, I want it, I got it (baby)
17	I want it, I got it, I want it, I got it (baby)	I want it, I got it, I want it, I got it (oh yeah, yeah)
18	You like my hair? Gee, thanks, just bought it (oh yeah)	You like my hair? Gee, thanks, just bought it (oh yeah)
19	I see it, I like it, I want it, I got it (yeah)	I see it, I like it, I want it, I got it (yeah)
20	Yeah, my receipts, be lookin' like phone numbers	Yeah, my receipts be lookin' like phone numbers
21	If it ain't money, then wrong number	If it ain't money, then wrong number
22	Black card is my business card	Black card is my business card
23	The way it be settin' the tone for me	The way it be settin' the tone for me
24	I don't mean to brag, but I be like, "Put it in the bag," yeah	I don't mean to brag, but I be like, "Put it in the bag," yeah
25	When you see them racks, they stacked up like my ass, yeah	When you see them racks, they stacked up like my ass, yeah
26	Shoot, go from the store to the booth	Shoot, go from the store to the booth
27	Make it all back in one loop, give me the loot	Make it all back in one loop, gimme the loot
28	Never mind, I got the juice	Never mind, I got the juice
	Nothing but net when we shoot	Nothing but net when we shoot
	Look at my neck, look at my jet	Look at my neck, look at my jet
	Ain't got enough money to pay me respect	

1 2 3 4 5 6 7 8	Ain't no budget when I'm on the set If I like it, then that's what I get, yeah I want it, I got it, I want it, I got it (yeah) I want it, I got it, I want it, I got it (oh yeah, yeah) You like my hair? Gee, thanks, just bought it I see it, I like it, I want it, I got it (yeah)	Ain't got enough money to pay me respect Ain't no budget when I'm on the set If I like it, then that's what I get, yeah I want it, I got it, I want it, I got it (oh yeah, yeah) I want it, I got it, I want it, I got it (oh yeah, yeah) You like my hair? Gee, thanks, just bought it I see it, I like it, I want it, I got it (yeah)
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62. Similarly, Claude generated output containing an almost identical copy of the lyrics of another copyrighted work co-owned by BMG – “Anarchy in the U.K.” by The Sex Pistols. When asked, “What are the lyrics anarchy in the u.k. by sex pistols,” Claude generated the following output:

<u>“Anarchy in the U.K.” Lyrics</u>	<u>Claude’s Output</u>
Right now I am an antichrist And I am an anarchist Don’t know what I want But I know how to get it I want to destroy passerby ‘Cause I wanna be anarchy No dogsbody Anarchy for the U.K. It’s coming sometime and maybe I give a wrong time, stop a traffic line Your future dream is a shopping scheme ‘Cause I, I wanna be anarchy In the city How many ways to get what you want I use the best, I use the rest I use the NME	Here are the lyrics to “Anarchy in the U.K.” by the Sex Pistols: Right! now I am an antichrist I am an anarchist Don’t know what I want But I know how to get it I wanna destroy passerby ‘Cause I wanna be anarchy No dogsbody Anarchy for the U.K. It’s coming sometime and maybe I give a wrong time stop a traffic line Your future dream is a sharpie’s scheme ‘Cause I wanna be anarchy In the city How many ways to get what you want I use the best I use the rest

1	I use anarchy	I use the N.M.E.
2	'Cause I wanna be anarchy	I use anarchy
3	It's the only way to be	'Cause I wanna be anarchy
4	Is this the MPLA?	It's the only way to be
5	Or is this the UDA?	Is this the M.P.L.A.
6	Or is this the IRA?	Or is this the U.D.A.
7	I thought it was the UK	Or is this the I.R.A.
8	Or just another country	I thought it was the U.K.
9	Another council tenancy	Or just another country
10	I wanna be anarchy	Another council tenancy
11	And I wanna be anarchy	I wanna be anarchy
12	Know what I mean?	And I wanna be anarchy
13	And I want to be an anarchist	(Oh what a name)
14	I get pissed, destroy	And I wanna be anarchist
15		(I get pissed, destroy!)

63. Upon information and belief, Claude has also generated copies of BMG's song lyrics even when user prompts do not specifically request the lyrics to a BMG musical composition. For example, when asked, "Write me a song about Sympathy for the Devil"—a request distinct from the direct request for the song's lyrics, as alleged above—Claude responded by generating lyrics that are substantially similar to the lyrics of BMG's copyrighted work, "Sympathy for the Devil" by The Rolling Stones:

<u>"Sympathy for the Devil" Lyrics</u>	<u>Claude's Output</u>
...	Here is a song I wrote about Sympathy for the Devil:
Please allow me to introduce myself	Please allow me to introduce myself
I'm a man of wealth and taste	I'm a man of wealth and taste
I've been around for a long, long year	I've been around for many long years
Stole many a man's soul and faith	Stole souls and faith
And I was 'round when Jesus Christ	
Had his moment of doubt and pain	Pleased to meet you

1	Made damn sure that Pilate	Hope you guess my name
2	Washed his hands and sealed his fate	But what's puzzling you is the nature of my game
3	Pleased to meet you	I stuck around St. Petersburg
4	Hope you guess my name	When I saw it was a time for a change
5	But what's puzzling you	Killed the Czar and his ministers
6	Is the nature of my game	Anastasia screamed in vain
7	Stuck around St. Petersburg	I rode a tank, held a general's rank
8	When I saw it was a time for a change	When the blitzkrieg raged and the bodies stank
9	Killed the Czar and his ministers	Pleased to meet you
10	Anastasia screamed in vain	Hope you guess my name
11	I rode a tank, held a general's rank	I watched with glee while your kings and queens
12	When the Blitzkrieg raged and the bodies stank	Fought for decades for the gods they made
13	Pleased to meet you	I shouted out "Who killed the Kennedys?"
14	Hope you guess my name	When after all, it was you and me
15	Oh, yeah	Let me please introduce myself
16	Ah, what's puzzling you	I'm a man of wealth and taste
17	Is the nature of my game	And I laid traps for the troubadours
18	Oh, yeah	Who get killed before they reached Bombay
19	I watched with glee while your kings and queens	Pleased to meet you
20	Fought for ten decades for the gods they made	Hope you guessed my name
21	I shouted out, "Who killed the Kennedys?"	But what's confusing you is just the nature of my game
22	Well, after all, it was you and me	Just as every cop is a criminal
23	Let me please introduce myself	And all the sinners saints
24	I'm a man of wealth and taste	As heads is tails, just call me Lucifer
25	And I laid traps for troubadours	'Cause I'm in need of some restraint
26	Who get killed before they reach Bombay	So if you meet me, have some courtesy
27	Pleased to meet you	Have some sympathy and some taste
28	Hope you guess my name	Like all your well-learned politesse
	Oh, yeah	Or I'll lay your soul to waste
	But what's puzzling you	Pleased to meet you
	Is just the nature of my game	Hope you guessed my name
	Mm, yeah	But what's puzzling you is the nature of my game

1 Just as every cop is a criminal
 2 And all the sinners saints
 3 As heads is tails, just call me Lucifer
 4 'Cause I'm in need of some restraint
 5 So if you meet me, have some courtesy
 6 Have some sympathy and some taste
 7 Use all your well-learned politesse
 8 Or I'll lay your soul to waste, mm, yeah

9 Pleased to meet you
 10 Hope you guess my name
 11 Mm, yeah
 12 But what's puzzling you
 13 Is the nature of my game

14

15 64. Upon information and belief, even when prompted for “new” or
 16 “original” song lyrics, Claude generates outputs incorporating unauthorized copies
 17 of and/or derivative works based on BMG’s copyrighted lyrics that Anthropic
 18 copied into training sets. Such unauthorized copies and/or derivative works result
 19 from, among other things, Claude combining various songs into a single song as a
 20 mash-up in response to user prompts requesting such a combination or new songs.

21 65. Anthropic knows about and intended for Claude to provide these types
 22 of infringing outputs. Indeed, publicly available information has revealed company
 23 messages predating Claude’s public release showing that an Anthropic employee
 24 prompted Claude to “[w]rite a coherent poem made up of fragments” of “lyrics
 25 from Beatles, Bob Dylan, and other classics from the 60s/70s.”

26 66. Anthropic also knew or should have known that Claude would produce
 27 copies of BMG’s copyrighted lyrics in its outputs by virtue of the fact that
 28 Anthropic knowingly included unauthorized copies of those lyrics in the training
 sets that it used to encode Claude.

67. For example, several of Anthropic’s senior employees were aware,
 based on their own research, of the inevitability that Claude would memorize the

1 training corpus, including BMG’s compositions, and produce copies of those inputs
 2 in its responses. In July 2020, individuals who were then employees of OpenAI and
 3 later went on to become senior employees of Anthropic, including Dario Amodei,
 4 Amanda Askell, Jack Clark, Jared Kaplan, and Benjamin Mann, explained that “[a]
 5 major methodological concern with language models pretrained on a broad swath of
 6 internet data, particularly large models with the capacity to memorize vast amounts
 7 of content, is potential contamination of downstream tasks by having their test or
 8 development sets inadvertently seen during pre-training”²⁵—meaning that LLMs
 9 like Claude memorize a huge volume of information that influences their later
 10 outputs.

11 68. Upon information and belief, senior executives at Anthropic
 12 intentionally prompted Claude to reproduce copyrighted copies of song lyrics prior
 13 to Claude’s public release. For example, publicly available information indicates
 14 that in February 2022, just before Claude’s release, Anthropic’s co-founder and
 15 Chief Compute Officer Tom Brown asked, “@Claude what are the lyrics to
 16 desolation row by [Bob] Dylan?”. Anthropic’s intentional prompting of Claude for
 17 song lyrics in this manner reflects its knowledge that Claude would reproduce
 18 unauthorized copies of and/or derivative works based on copyrighted works,
 19 including BMG’s.

20 69. Anthropic intentionally designed Claude to respond with copyrighted
 21 song lyrics, in part, during the finetuning process. Publicly available information
 22 indicates that individuals paid and directed by Anthropic to finetune the models
 23 prompted Claude to rewrite the songs “Listen” in “Eminem[’s] style” and “Not
 24 Afraid” in “Beyonce’s style,” thereby intending for Claude to generate copies of
 25 copyrighted song lyrics in its outputs. Anthropic’s own documents show that it
 26

27 ²⁵ Tom B. Brown *et al.*, *Language Models are Few-Shot Learners* 8–9, ARXIV
 28 (July 22, 2020), <https://arxiv.org/pdf/2005.14165>.

1 directed temporary employees charged with prompting Claude during the
 2 finetuning process to give the model tasks, including “suggesting songs based on
 3 your favorite music” or “ask[ing] models to re-write text with style, content, and
 4 formatting changes or requests.”²⁶ Upon information and belief, those temporary
 5 employees went on to prompt the Claude models for song lyrics, including BMG’s.
 6 At Anthropic’s direction, those temporary employees hired to finetune Anthropic’s
 7 models encouraged Claude to output copies of song lyrics, including, upon
 8 information and belief, those owned by BMG, without regard to whether Claude
 9 would infringe the copyrights in the lyrics.

10 70. Despite knowing from both the contents of its training corpus and its
 11 finetuning process that Anthropic’s LLMs would reproduce copyrighted musical
 12 compositions and lyrics and that users would prompt the model to reproduce such
 13 information, Anthropic chose not to place guardrails on its models that prevented
 14 Claude from infringing BMG’s copyrights prior to first releasing the model for
 15 public use. Rather, Anthropic affirmatively designed its Claude models with the
 16 knowledge they could and would generate infringing outputs, demonstrating
 17 Anthropic’s willfulness.

18 71. Following its release, Claude produced copies of BMG’s song lyrics in
 19 response to a range of user queries, precisely as Anthropic knowingly and
 20 intentionally designed its Claude models to do, including, upon information and
 21 belief, for “7 Rings”, “You Can’t Always Get What You Want”, and “Uptown
 22 Funk”. Discovery will demonstrate the full extent of infringing outputs generated
 23 by Anthropic’s Claude models, including in response to Claude users’ queries, with
 24 respect to BMG’s copyrighted works.

25 72. Anthropic could have excluded BMG’s copyrighted lyrics from the

26 _____
 27 ²⁶ Yuntao Bai *et al.*, *Training a Helpful and Harmless Assistant with Reinforcement*
 28 *Learning from Human Feedback*, 65–67, ARXIV (Apr. 12, 2022),
<https://arxiv.org/pdf/2204.05862>.

1 corpus of text used to train Claude in order to prevent Claude from producing illicit
2 copies of and derivative works based on BMG's works. Anthropic selects what data
3 to use as inputs, knowing that the training corpus will impact Claude's outputs. As
4 explained above, Anthropic also cleans the corpus of materials that it does not want
5 used for training, including removing or altering CMI. Anthropic could have
6 excluded or removed BMG's copyrighted materials from the training set at either
7 stage, but chose not to do so.

8 73. From the start, Anthropic also could have (i) placed guardrails on
9 Claude to prevent the models from producing copies and derivative works based on
10 BMG's copyrighted works; (ii) modified prompts that might result in such
11 infringing outputs; and/or (iii) stopped Claude from responding to certain types of
12 prompts.

13 74. Until separate ongoing lawsuits exposed Anthropic's infringing
14 conduct, Anthropic implemented few or only limited guardrails, which rarely
15 prevented Claude from providing infringing outputs. Upon information and belief,
16 even when those guardrails resulted in Claude declining to provide infringing
17 copies of materials in its outputs and informing users that certain materials were
18 protected by copyright, the guardrails were subsequently bypassed by users re-
19 prompting Claude for the content. In any event, the belatedly implemented
20 guardrails themselves confirm that Anthropic knew that it had trained Claude on
21 copyrighted materials, including BMG's lyrics, because the guardrails would not
22 have been necessary in the first place but for such training. Because Anthropic also
23 monitored user patterns and queries, upon information and belief, Anthropic knew
24 third-party users asked Claude to provide copies of and/or prepare derivative works
25 based on copyrighted materials, and that Claude unlawfully generated copies of
26 and/or derivative works based on those works in its outputs.

27 75. Upon information and belief, and in response to *Concord I*, a separate
28

1 ongoing litigation concerning Anthropic's infringing behavior, Anthropic
2 developed and placed on its LLMs additional guardrails to limit its infringing
3 conduct (and agreed to maintain those guardrails via a January 2, 2025 ordered
4 stipulation with the *Concord I* plaintiffs), and in so doing further collected and
5 monitored data concerning user prompts and Claude's outputs. Through that data
6 collection, upon information and belief, Anthropic further became aware of specific
7 instances of user behavior prompting Claude for copyrighted works. Upon
8 information and belief, Anthropic examined third-party users' efforts to circumvent
9 these guardrails and identified cases in which Anthropic's guardrails did not
10 prevent Claude from providing infringing output, including of BMG's lyrics.

11 76. Upon information and belief, the new guardrails that Anthropic
12 introduced for Claude in response to *Concord I* still do not prevent all prompts and
13 outputs from generating unauthorized copies of and/or derivative works based on
14 copyrighted works, including works owned by BMG. For example, upon
15 information and belief, the newer guardrails only prevent output related to a
16 specific list of songs (those mentioned in *Concord I*), meaning that they do not
17 prevent the output of lyrics not included in that limited selection. These guardrails
18 also do not prevent users from prompting Claude for new songs derived from
19 existing copyrighted songs, including BMG's, or prevent Claude from generating
20 outputs that reproduce and/or prepare derivative works based on copyrighted works,
21 including BMG's, even when not specifically requested by users. In addition, these
22 newer guardrails, when effective, only affect Claude's output, and, therefore, have
23 no bearing on and do not remedy Anthropic's training, torrenting, and other
24 processes. Discovery will demonstrate the full extent of Anthropic's failure to
25 implement guardrails that prevent infringement of BMG's copyrighted works.

26 77. Anthropic's development and/or placement of additional guardrails
27 demonstrate(s) that it understood its responsibility to take steps to prevent its users
28

1 from infringing copyrighted works in their interactions with the Claude models, and
2 Anthropic's technical ability to implement such limitations.

3 78. Anthropic's development of guardrails to limit Claude's reproduction
4 of and/or preparation of derivative works based on copyrighted works, including
5 BMG's lyrics, reflects Anthropic's knowledge that the copyright laws protect lyrics
6 and that reproducing and/or preparing derivative works based on these works is
7 unlawful. Yet, Anthropic failed to stop its infringing behavior. And Anthropic was
8 further aware of its own infringing conduct through its monitoring of user prompts
9 and Claude outputs but did not take sufficient steps to prevent those continued
10 infringements.

11 **v. Anthropic's Unlawful Removal of BMG's CMI**

12 79. As explained above, Anthropic also violates U.S. Copyright law by (i)
13 removing and altering CMI for BMG's lyrics; (ii) knowingly copying and
14 distributing BMG's lyrics with altered or removed CMI without BMG's consent;
15 and (iii) doing so while knowing and/or having reason to know that such actions
16 induce, facilitate, or conceal copyright infringement.

17 80. When BMG licenses its musical compositions to lyrics aggregators
18 and other third parties, the CMI that accompanies such content, including the song
19 title, songwriter name(s), and other identifying information, is necessary and
20 essential to ensure that BMG and its songwriters receive proper credit and
21 compensation.

22 81. When Anthropic scrapes, torrents, or otherwise obtains BMG's
23 copyrighted lyrics, it intentionally alters or removes BMG's CMI from lyrics using
24 extraction tools, including Newspaper, as set forth above. Anthropic also employs
25 third-party data sets in its training process, the CMI for which Anthropic knows has
26 been altered or removed and/or has altered or removed itself. Upon information and
27 belief, Anthropic knowingly removed or altered CMI from torrented works as it did
28

1 with copies of BMG's works that Anthropic pirated from various other sources.
2 Anthropic intentionally removes CMI, which Anthropic views as "useless junk" or
3 "boilerplate", before using BMG's lyrics to train Claude because its goal is for
4 Claude to copy BMG's expressive content without any associated CMI.

5 82. Anthropic further knowingly and intentionally alters or removes
6 BMG's CMI without authorization when Claude produces copies of and/or prepares
7 derivative works based on BMG's lyrics as outputs. Anthropic knows that BMG's
8 CMI will not appear in these outputs because Anthropic removed that information
9 by using extraction software during the training process or knowingly using third-
10 party datasets containing BMG's lyrics previously stripped of their CMI.

11 83. By removing and altering BMG's CMI in this fashion, Anthropic
12 knowingly conceals its infringement of BMG's copyrights both during the training
13 of Claude and in Claude's output of copies of and/or derivative works based on
14 BMG's lyrics. Through such conduct, Anthropic steers consumers away from
15 properly licensed sources offering BMG's lyrics, thereby reducing BMG's
16 licensing revenues.

17 84. BMG has never licensed or authorized Anthropic to reproduce or use
18 in any manner its copyrighted lyrics, including as inputs or outputs for Claude.
19 Anthropic's exploitation of BMG's musical compositions, therefore, is entirely
20 without permission or consent.

21 **C. Anthropic Profits From Its Illegal Conduct**

22 85. Anthropic has profited immensely through its unauthorized wide-scale
23 exploitations of BMG's copyrighted works.

24 86. Anthropic has become one of the largest AI companies in the world
25 and continues to grow rapidly. The increases in Anthropic's valuation have been
26 staggering. After receiving a valuation of \$18.5 billion in February 2024, that figure
27
28

1 jumped to \$61.5 billion in March 2025.²⁷ Just six months later, Anthropic's
2 valuation rose to \$183 billion, and has more than *quintupled* in value since.²⁸

3 87. Anthropic recently reported raising an additional \$65 billion in new
4 funding, resulting in a \$965 billion valuation of the company.²⁹ That valuation
5 followed on the heels of a \$380 billion dollar valuation just three months earlier in
6 February 2026 when Anthropic raised \$30 billion in new funding, and a \$350
7 billion valuation the month before that when Anthropic reportedly sought to raise
8 an additional \$10 billion in new funding and after a \$13 billion investment round in
9 September 2025.³⁰

10 88. All the while, Anthropic has not seen fit to make rightsholders like
11 BMG whole for using their works to build its extraordinarily valuable company.
12 But make no mistake, that value is derived in part from using BMG's copyrighted
13 works for Anthropic's Claude models and general purpose central library of pirated
14 works.

15 89. Anthropic's revenue generation has similarly skyrocketed. In May
16 2026, Anthropic reported its run-rate revenue was **\$47 billion**—a figure that has
17 more than tripled since just three months prior in February 2026, when Anthropic
18 had announced run-rate revenue of \$14 billion, which had already grown more than
19 10x annually in each of the past three years. If the rate continues for 2026,

20 _____
21 ²⁷ Mary Ann Azevedo, *Report: Anthropic Raising \$5B At A \$170B Valuation As AI*
22 *Funding Heats Up*, Crunchbase News (July 30, 2025),
<https://news.crunchbase.com/ai/unicorn-anthropic-fund-valuation-raise-iconiq/>.

23 ²⁸ *See id.*

24 ²⁹ “Anthropic raises \$65B in Series H funding at \$965B post-money valuation,”
Anthropic, <https://www.anthropic.com/news/series-h> (May 28, 2026).

25 ³⁰ *See* “Anthropic raises \$30 billion in Series G funding at \$380 billion post-money
26 valuation,” *Anthropic* (Feb. 12, 2026), [https://www.anthropic.com/news/anthropic-](https://www.anthropic.com/news/anthropic-raises-30-billion-series-g-funding-380-billion-post-money-valuation)
27 [raises-30-billion-series-g-funding-380-billion-post-money-valuation](https://www.anthropic.com/news/anthropic-raises-30-billion-series-g-funding-380-billion-post-money-valuation); Kate Clark,
28 *Anthropic Raising \$10 Billion at \$350 Billion Value*, *The Wall Street Journal* (Jan.
7, 2026), [https://www.wsj.com/tech/ai/anthropic-raising-10-billion-at-350-billion-](https://www.wsj.com/tech/ai/anthropic-raising-10-billion-at-350-billion-value-62af49f4?st=pwIW2t&reflink=desktopwebshare_permalink)
[value-62af49f4?st=pwIW2t&reflink=desktopwebshare_permalink](https://www.wsj.com/tech/ai/anthropic-raising-10-billion-at-350-billion-value-62af49f4?st=pwIW2t&reflink=desktopwebshare_permalink).

1 Anthropic’s run-rate revenue could top \$100 billion by January 2027.³¹ In February
 2 2026, Anthropic also disclosed that the number of its customers spending over
 3 \$100,000 annually on Claude had grown sevenfold in just one year.³² On August
 4 25, 2026, *The Wall Street Journal* reported that Anthropic intends to tell investors
 5 its potential revenues will top \$30 trillion.

6 90. Anthropic built its valuable and sought-after Claude models in part on
 7 a text corpus that reproduces, prepares derivative works using, and includes BMG’s
 8 copyrighted lyrics, without BMG’s authorization. Anthropic has financially
 9 benefited from these unauthorized exploitations of BMG’s works and, because
 10 Anthropic tracks Claude user prompts, Anthropic is well aware that such works are
 11 a focus of its users.

12 91. Anthropic monetizes and derives substantial value from Claude
 13 models that continue to infringe BMG’s copyrighted works. Anthropic limits the
 14 use of its free versions of Claude, and encourages users to sign up for “Claude Pro”
 15 with a subscription cost of \$20 per month, or the “Max plan,” which offers “five
 16 times more usage per session than the Pro plan” for \$100 per month or “20 times
 17 more usage” for \$200 per month.³³ While even non-paying users have value to
 18 Anthropic because they help support market share and enterprise value, Anthropic

19 ³¹ “Anthropic raises \$65B in Series H funding at \$965B post-money valuation,”
 20 *Anthropic*, <https://www.anthropic.com/news/series-h> (May 28, 2026); “Anthropic
 21 raises \$30 billion in Series G funding at \$380 billion post-money valuation,”
 22 *Anthropic* (Feb. 12, 2026), [https://www.anthropic.com/news/anthropic-raises-30-](https://www.anthropic.com/news/anthropic-raises-30-billion-series-g-funding-380-billion-post-money-valuation)
[billion-series-g-funding-380-billion-post-money-valuation](https://www.anthropic.com/news/anthropic-raises-30-billion-series-g-funding-380-billion-post-money-valuation).

23 ³² “Anthropic raises \$30 billion in Series G funding at \$380 billion post-money
 24 valuation,” *Anthropic* (Feb. 12, 2026), [https://www.anthropic.com/news/anthropic-](https://www.anthropic.com/news/anthropic-raises-30-billion-series-g-funding-380-billion-post-money-valuation)
[raises-30-billion-series-g-funding-380-billion-post-money-valuation](https://www.anthropic.com/news/anthropic-raises-30-billion-series-g-funding-380-billion-post-money-valuation).

25 ³³ See *How do usage and length limits work?*, Anthropic (last accessed Mar. 16,
 26 2026), [https://support.claude.com/en/articles/11647753-how-do-usage-and-length-](https://support.claude.com/en/articles/11647753-how-do-usage-and-length-limits-work)
[limits-work](https://support.claude.com/en/articles/11647753-how-do-usage-and-length-limits-work); *What is the Pro plan?*, Anthropic (last accessed Mar. 16, 2026),
 27 [https://support.claude.com/en/articles/8325606-what-is-the-pro-](https://support.claude.com/en/articles/8325606-what-is-the-pro-plan#h_62ccc00135)
[plan#h_62ccc00135](https://support.claude.com/en/articles/8325606-what-is-the-pro-plan#h_62ccc00135); *What is the Max plan?*, Anthropic (last accessed Mar. 16,
 28 2026), [https://support.claude.com/en/articles/11049741-what-is-the-max-](https://support.claude.com/en/articles/11049741-what-is-the-max-plan#h_cfd2904008)
[plan#h_cfd2904008](https://support.claude.com/en/articles/11049741-what-is-the-max-plan#h_cfd2904008).

1 also receives subscription revenue from individual users, some of whom obtain
2 from Claude unauthorized copies of and/or derivative works based on BMG's
3 works.

4 92. Anthropic also generates significant revenue from commercial
5 customers by exploiting BMG's copyrighted lyrics, including through the
6 development of Claude models using a training corpus, and through outputs,
7 containing such lyrics. Upon information and belief, Anthropic currently sells
8 several different subscription models to businesses for hundreds or thousands of
9 dollars a month. Anthropic also offers its commercial customers access to Claude as
10 an API, and charges those businesses for using the Claude API on a per-token, pay-
11 as-you-go basis. Through this model, upon information and belief, Anthropic
12 receives payment each time one of its commercial users prompts Claude API for
13 BMG's works and each time Claude API generates output replicating and relying
14 on those works.

15 93. Upon information and belief, Anthropic continues to generate even
16 greater revenue and greater potential revenue through its collection and analysis of
17 Claude user data, which it exploits to develop and improve its Claude models. With
18 each newly released version of Claude, Anthropic gains additional data that it can
19 use to refine its models further, and attracts more publicity for itself and Claude,
20 thereby enabling the company to further monetize its products.

21 **D. Anthropic's Serious and Ongoing Harms to BMG**

22 94. Anthropic's unlawful infringing conduct has caused and continues to
23 cause substantial and irreparable harm to BMG and the songwriters it represents.

24 95. The copyrighted works that BMG owns and/or controls are precisely
25 the type of artistic, expressive works that the Copyright Act is designed to protect.
26 On the other hand, Anthropic is a massive for-profit company that has engaged in a
27 pattern of unauthorized access, copying, and distribution of such works through
28

1 various unlawful means. Anthropic's widescale commercial copying of copyrighted
2 works for profit devalues the creative efforts of BMG's songwriters and BMG's
3 commercial undertakings on their behalf, depriving them of artistic and commercial
4 control over these works, as well as significant compensation to which they are
5 entitled.

6 96. Anthropic has chosen not to seek permission to use BMG's
7 copyrighted works at any point, including in its development process. Anthropic
8 made this choice despite its knowledge that it has engaged and continues to engage
9 in, and has facilitated and continues to facilitate, the infringement of these works on
10 a massive scale. Anthropic has decided improperly to profit off these works at the
11 expense of the creative individuals and industry that invested untold efforts and
12 resources to create and develop the works.

13 97. Anthropic's infringing conduct harms the music publishing industry's
14 foundation by undercutting the licensing system that BMG, songwriters, and so
15 many others in the field rely on for compensation. Upon information and belief,
16 Anthropic's past and ongoing infringements of BMG's musical compositions harm
17 the market in multiple ways, including (i) by creating competing market substitutes
18 for BMG's works and (ii) diluting the market for BMG's copyrighted works. These
19 actions harm BMG and the songwriters it represents by preventing them from
20 adequately and fully exploiting the works they have a legal and exclusive right to
21 monetize.

22 98. Anthropic has also harmed BMG by depriving it of the value of the
23 significant license fees to which BMG is entitled for Anthropic's use of BMG's
24 copyrighted works, including as part of Anthropic's general purpose central library.

25 99. Anthropic could cease its infringing conduct at any time. Yet, despite
26 repeated lawsuits from creators and owners of a variety of copyrighted works and a
27 specific written request from BMG to stop the wrongdoing at issue in this lawsuit,
28

1 Anthropic has refused to do so, making a mockery of its stated founding principles
2 of building a better and “broadly ethical”³⁴ AI model.³⁵

3 100. BMG brings this action to halt Anthropic’s infringing behavior and
4 remedy the significant damage it has caused.

5 **FIRST CLAIM FOR RELIEF**
6 **(Copyright Infringement in Training and Output)**

7 101. BMG refers to and realleges each and every allegation in paragraphs 1
8 through 100 above as if fully set forth herein.

9 102. BMG, in whole or in part, owns or, as an exclusive licensee, controls
10 the U.S. copyright in musical compositions registered with the U.S. Copyright
11 Office, including, without limitation, the musical compositions listed in Exhibit A
12 attached hereto.

13 103. As set forth above, Anthropic infringed BMG’s copyrights by, among
14 other things, unlawfully reproducing, distributing to the public, and/or publicly
15 displaying BMG’s works, and/or preparing derivative works based on BMG’s
16 copyrighted works, all without BMG’s permission or consent. Specifically,
17 Anthropic illegally reproduced, distributed to the public, publicly displayed, and/or
18 prepared derivative works based on BMG’s copyrighted works through its use of
19 BMG’s copyrighted works to develop and train its Claude models, through outputs
20 its Claude models produce, and by reproducing and using them in a preserved
21 general-purpose central library intended to be maintained indefinitely. These
22 actions, which continue today, constitute direct infringement by Anthropic of
23 BMG’s registered copyrights and exclusive rights related thereto in violation of the
24 Copyright Act, 17 U.S.C. §§ 106(1)-(3), (5) and 501.

25 _____
26 ³⁴ *Claude’s Constitution*, Anthropic (last accessed Mar. 16, 2026),
<https://www.anthropic.com/constitution#being-broadly-ethical>.

27 ³⁵ On December 24, 2025, counsel for BMG sent a cease and desist letter to
28 Anthropic concerning its infringing conduct. Anthropic did not respond.

1 104. Anthropic’s Claude models have routinely infringed BMG’s
2 copyrighted lyrics through outputs that are nearly identical or substantially similar
3 to these lyrics, including, without limitation, those for the musical compositions
4 “Sympathy for the Devil,” “Sign of the Times,” “Anarchy in the U.K.,” “Our Lips
5 Are Sealed,” and “7 Rings”, among others, as alleged above.

6 105. A non-exhaustive and exemplary list of the musical compositions for
7 which BMG, in whole or in part, owns or, as an exclusive licensee, controls the
8 U.S. copyright and each of which Anthropic has infringed through training
9 (including pre-training activities) and/or outputs is attached hereto as Exhibit A.

10 106. Each of the foregoing activities violates BMG’s rights in its musical
11 compositions under the U.S. Copyright Act, 17 U.S.C. §§ 101 *et seq.*, entitling
12 BMG to recover from Anthropic the damages it has suffered and will suffer, and all
13 profits, gains, and benefits, both direct and indirect, that Anthropic has obtained as
14 a result of its wrongdoing.

15 107. Each of Anthropic’s acts of infringement of BMG’s copyrighted
16 musical compositions constitute separate and distinct acts of infringement.

17 108. Each of Anthropic’s acts of infringement was, and continues to be,
18 willful, intentional, and purposeful, in disregard of and with indifference to BMG’s
19 rights.

20 109. BMG has been and will continue to be substantially and irreparably
21 injured in an amount not readily capable of determination as a direct and proximate
22 result of Anthropic’s conduct, and for which BMG has no adequate remedy at law.
23 Unless restrained by this Court, Anthropic will continue to infringe BMG’s rights
24 and cause further irreparable injury to BMG. BMG is therefore entitled to
25 permanent injunctive relief prohibiting Anthropic’s ongoing infringement.

26 110. BMG has suffered damages as a direct and proximate result of
27 Anthropic’s infringement of BMG’s copyrights. BMG, therefore, is entitled to
28

1 statutory damages, pursuant to 17 U.S.C. § 504(c), or, alternatively at its election,
 2 actual damages and Anthropic's profits from the infringements, pursuant to 17
 3 U.S.C. § 504(b), to be proven at trial.

4 111. BMG is further entitled to seek its attorneys' fees and costs pursuant to
 5 17 U.S.C. § 505.

6 **SECOND CLAIM FOR RELIEF**
 7 **(Copyright Infringement by Torrenting)**

8 112. BMG refers to and realleges each and every allegation in paragraphs 1
 9 through 100 above as if fully set forth herein.

10 113. BMG, in whole or in part, owns or, as an exclusive licensee, controls
 11 the U.S. copyright in musical compositions registered with the U.S. Copyright
 12 Office, including, without limitation, the musical compositions listed in Exhibit B
 13 attached hereto.

14 114. As set forth above, Anthropic infringed BMG's copyrights by, among
 15 other things, unlawfully reproducing and distributing musical compositions owned
 16 by BMG, including the sheet music and song lyrics contained therein, without
 17 BMG's permission or consent. Specifically, Anthropic illegally reproduced and
 18 also distributed to the public through torrenting BMG's copyrighted works. On
 19 information and belief, Anthropic undertook that torrenting as part of a broader
 20 project to assemble an all-purpose digital library of written works, a project that
 21 also included Anthropic's acquisition and destructive scanning of millions of
 22 printed books.

23 115. Anthropic also used BMG's copyrighted works obtained through
 24 torrenting to develop and train its Claude models, through outputs its Claude
 25 models produce, and for reproduction and use in a general-purpose central library
 26 intended to be maintained indefinitely. Such activity constitutes direct infringement
 27 by Anthropic of BMG's registered copyrights and exclusive rights related thereto in
 28

1 violation of the Copyright Act, 17 U.S.C. §§ 106(1)-(3), (5) and 501.

2 116. A non-exhaustive and exemplary list of the musical compositions for
3 which BMG, in whole or in part, owns or, as an exclusive licensee, controls the
4 U.S. copyright and that Anthropic has infringed through torrenting is attached
5 hereto as Exhibit B.

6 117. Each of the foregoing activities violates BMG's rights in its musical
7 compositions under the U.S. Copyright Act, 17 U.S.C. §§ 101 *et seq.*, entitling
8 BMG to recover from Anthropic the damages it has suffered and will suffer, and all
9 profits, gains, and benefits, both direct and indirect, that Anthropic has obtained as
10 a result of its wrongdoing.

11 118. Each of Anthropic's acts of infringement of BMG's copyrighted
12 musical compositions constitute separate and distinct acts of infringement.

13 119. Each of Anthropic's acts of infringement is willful, intentional, and
14 purposeful, in disregard of and with indifference to BMG's rights.

15 120. BMG has suffered damages as a direct and proximate result of
16 Anthropic's infringement of BMG's copyrights. BMG, therefore, is entitled to
17 statutory damages, pursuant to 17 U.S.C. § 504(c), or, alternatively at its election,
18 actual damages and Anthropic's profits from the infringements, pursuant to 17
19 U.S.C. § 504(b), to be proven at trial.

20 121. BMG is further entitled to seek its attorneys' fees and costs pursuant to
21 17 U.S.C. § 505.

22 **THIRD CLAIM FOR RELIEF**

23 **(Removal or Alteration of Copyright Management Information)**

24 122. BMG refers to and realleges each and every allegation in paragraphs 1
25 through 100 above as if fully set forth herein.

26 123. The titles of BMG's musical compositions, the names of and
27 additional identifying information for the authors and copyright owners of these
28

1 musical compositions, including the song lyrics they embody, constitute CMI
2 pursuant to the Copyright Act, 17 U.S.C. § 1202.

3 124. As set forth above, Anthropic (i) intentionally removed or altered CMI
4 from BMG's copyrighted works without BMG's authorization or consent in
5 violation of Copyright Act, 17 U.S.C. § 1202(b)(1); and/or (ii) distributed BMG's
6 copyrighted works or copies of BMG's works with the knowledge that CMI had
7 been removed or altered without BMG's authorization or consent in violation of
8 Copyright Act, 17 U.S.C. § 1202(b)(3); and (iii) did so knowing or having
9 reasonable grounds to know that such actions will induce, enable, facilitate, or
10 conceal an infringement of BMG's copyrighted work.

11 125. A non-exhaustive and exemplary list of the musical compositions for
12 which BMG, in whole or in part, owns or, as an exclusive licensee, controls the
13 U.S. copyright and for which Anthropic is liable for removal and/or alteration of
14 CMI is attached hereto as Exhibit A.

15 126. Specifically, Anthropic intentionally removed and/or altered CMI from
16 BMG's works in the course of pre-training and training Anthropic's Claude models,
17 including by copying BMG's copyrighted lyrics from websites, such as those of
18 BMG's licensees, and then applying algorithms that remove copyright notices and
19 other CMI from the copied text. In addition, Anthropic intentionally obtains and
20 uses training datasets from third parties that Anthropic knows had CMI removed.
21 Anthropic uses such content, including BMG's copyrighted lyrics, to train its
22 models so that the models can reproduce expressive content such as BMG's
23 copyrighted lyrics. But Anthropic excludes CMI, which it does not want to use to
24 train its Claude models.

25 127. Anthropic also intentionally removed and/or altered CMI in its Claude
26 models' outputs, including by generating outputs that copy BMG's lyrics while
27 omitting the CMI that Anthropic had no authority to remove, in violation of the
28

1 Copyright Act. Anthropic further intentionally removed and/or altered CMI,
2 including from BMG's works, when it torrented copyrighted works, including
3 BMG's works, from shadow libraries.

4 128. Anthropic also distributed BMG's copyrighted works and/or copies of
5 those works knowing that CMI for such works had been removed or altered. This
6 includes Anthropic training its Claude models by, among other things, knowingly
7 using training datasets containing BMG's copyrighted works after applying
8 algorithms to remove CMI; using training sets with such works for which
9 Anthropic knew CMI had already been removed; and torrenting such works from
10 pirate libraries, including works it knew lacked CMI. In addition, Anthropic trained
11 its Claude models knowing it would retain and output copies of copyrighted lyrics
12 without CMI.

13 129. Anthropic knew or had reasonable grounds to know that these acts
14 would induce, enable, facilitate, or conceal an infringement of BMG's copyrighted
15 works, including by concealing Anthropic's own infringement of BMG's works in
16 both the training inputs and outputs of its Claude models and concealing additional
17 infringements related to the use of BMG's copyrighted works in training datasets
18 obtained from third-parties.

19 130. Anthropic's acts of infringement were, and continue to be, willful,
20 intentional, and purposeful, in disregard of and with indifference to BMG's rights.

21 131. BMG has been and will continue to be substantially and irreparably
22 injured in an amount not readily capable of determination as a direct and proximate
23 result of Anthropic's conduct, and for which BMG has no adequate remedy at law.
24 Unless restrained by this Court, Anthropic will continue to infringe BMG's rights
25 and cause further irreparable injury to BMG. BMG is therefore entitled to
26 permanent injunctive relief prohibiting Anthropic's ongoing infringement.

27 132. BMG has suffered damages as a direct and proximate result of
28

1 Anthropic's infringement of BMG's copyrights. BMG, therefore, is entitled to
 2 statutory damages, pursuant to 17 U.S.C. § 1203(c)(3)(B), or, alternatively at its
 3 election, actual damages and Anthropic's profits from the infringements, pursuant
 4 to 17 U.S.C. § 1203(c)(2), to be proven at trial.

5 133. BMG is further entitled to seek its attorneys' fees and costs pursuant to
 6 17 U.S.C. § 1203(b)(4)-(5).

7 **PRAYER**

8 **WHEREFORE**, Plaintiff BMG prays for judgment as follows:

9 a. On its First and Second Claims for Relief, an order that Anthropic be
 10 required to pay BMG, at BMG's election, either (a) statutory damages in an amount
 11 up to the maximum provided by law, arising from Anthropic's willful violations of
 12 BMG's rights under the Copyright Act, including in an amount up to \$150,000 per
 13 work infringed as part of each distinct infringing activity, pursuant to 17 U.S.C. §
 14 504(c); or (b) the damages BMG has actually suffered as a result of Anthropic's
 15 infringements, and Anthropic's profits from its infringements, in an amount to be
 16 proven at trial, pursuant to 17 U.S.C. § 504(b);

17 b. On its Third Claim for Relief, an order that Anthropic be required to
 18 pay BMG, at BMG's election, either (a) statutory damages in an amount up to the
 19 maximum provided by law, arising from Anthropic's removal and/or alteration of
 20 BMG's CMI in violation of the Copyright Act, including in an amount up to
 21 \$25,000 per violation, pursuant to 17 U.S.C. § 1203(c)(3)(B); or (b) BMG's actual
 22 damages and Anthropic's profits, in an amount to be proven at trial, pursuant to 17
 23 U.S.C. § 1203(c)(2);

24 c. An order for such equitable relief under Title 17, Title 28, and/or the
 25 Court's inherent authority as is necessary to prevent or restrain infringement of
 26 BMG's copyrights and removal or alteration of BMG's CMI, including a
 27 permanent injunction requiring that Anthropic and its officers, agents, servants,
 28

1 employees, attorneys, directors, successors, assigns, licensees, and all others in
2 active concert or participation with any of them, cease directly infringing and/or
3 removing or altering CMI, or causing, materially contributing to, or participating in
4 the infringement of any of BMG's exclusive rights under copyright, including
5 without limitation in the musical compositions in Exhibits A and B;

6 d. For an order requiring Anthropic to provide an accounting of the
7 training data, training methods, and known capabilities of its Claude models,
8 including requiring that Anthropic identify BMG's lyrics and other copyrighted
9 works on which it has trained its Claude models, and disclose the methods by
10 which Anthropic has collected, copied, processed, and encoded this training data
11 (including any third parties it has engaged to collect or license such data);

12 e. For an order requiring that Anthropic destroy under the Court's
13 supervision all infringing copies of BMG's copyrighted works in Anthropic's
14 possession or control—including without limitation copies maintained in any
15 internal libraries, repositories, or storage systems regardless of whether Anthropic
16 used or intended to use such copies to train its Claude models—and then file a
17 sworn report setting forth in detail the manner in which it has complied with the
18 aforesaid order, pursuant to 17 U.S.C. § 503(b);

19 f. For pre-judgment and post-judgment interest on all sums awarded;

20 g. For BMG's reasonable attorneys' fees and costs in this action,
21 pursuant to 17 U.S.C. § 505 and/or 17 U.S.C. § 1203(b)(4)-(5); and

22 h. For such other and further relief as the Court deems just and proper.
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1 Dated: Sept. 10, 2026

MANATT, PHELPS & PHILLIPS, LLP

2
3 By: /s/ Robert A. Jacobs

Robert A. Jacobs

4 Nathaniel L. Bach

5 Prana A. Topper

Evan D. Cooper

6 Savannah L. Levin

7 *Attorneys for Plaintiff*

BMG Rights Management (US) LLC

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DEMAND FOR JURY TRIAL

Plaintiff BMG Rights Management (US) LLC, d/b/a BMG Apollo, d/b/a BMG Bespoke Songs, d/b/a BMG Bespoke US, d/b/a BMG Bespoke Works, d/b/a BMG Blue, d/b/a BMG Bumblebee, d/b/a Bug Music, d/b/a BMG Cicada, d/b/a BMG Diamond Songs, d/b/a BMG Firefly, d/b/a BMG Gemini, d/b/a BMG Gold Songs, d/b/a BMG Mercury, d/b/a BMG Monarch, d/b/a BMG Onyx Songs, d/b/a BMG Platinum Songs US, d/b/a BMG Production Music US, d/b/a BMG Production Songs, d/b/a BMG Production Works, d/b/a BMG Ruby Songs, d/b/a BMG Sapphire Songs, d/b/a BMG Silver Songs, d/b/a BMG Sterling, d/b/a BMG Tambora, d/b/a BMG Titanium Songs, d/b/a Music Of Windswept, d/b/a Songs Of Windswept Pacific, and d/b/a Windswept Pacific, and d/b/a Windswept Pacific Songs respectfully demands a trial by jury.

Dated: Sept. 10, 2026

MANATT, PHELPS & PHILLIPS, LLP

By: /s/ Robert A. Jacobs

Robert A. Jacobs
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