

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case No. 3:23-cv-01092

Chief Judge Waverly D. Crenshaw, Jr.
Magistrate Judge Alistair Newbern

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65, plaintiffs Concord Music Group, Inc., Capitol CMG, Inc., Universal Music Corp., Songs of Universal, Inc., Universal Music – MGB NA LLC, Polygram Publishing, Inc., Universal Music – Z Tunes LLC, and ABKCO Music, Inc. (collectively, “Publishers”) move for a preliminary injunction against defendant Anthropic PBC (“Anthropic”).

Anthropic is an artificial intelligence (“AI”) company engaged in blatant and widespread copyright infringement. Anthropic has built its AI models and a multibillion-dollar business by systematically copying and disseminating copyrighted text, including the lyrics to musical compositions owned and controlled by Publishers. In doing so, Anthropic violates Publishers’ copyrights, unlawfully enriches itself at the expense of Publishers and their songwriters, and causes irreparable harm. Publishers seek a preliminary injunction narrowly tailored to address these ongoing harms and stem Anthropic’s infringement while this case proceeds.

For these reasons and as set forth more fully in the accompanying Memorandum of Law and supporting exhibits, Publishers respectfully request that the Court grant this Motion and enter a preliminary injunction (1) requiring Anthropic to implement effective guardrails in its

currently available AI models to prevent output that reproduces, distributes, or displays Publishers' lyrics, including the 500 representative works identified in Exhibit A to the Complaint, and (2) precluding Anthropic from creating or using unauthorized copies of Publishers' lyrics to train future AI models.

Respectfully submitted,

/s/ Steven A. Riley

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CERTIFICATE OF SERVICE

I hereby certify that on November 16, 2023, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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