

EXHIBIT A

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

CONCORD MUSIC GROUP, INC., ET AL.,

Plaintiffs,

v.

ANTHROPIC PBC,

Defendant.

Case Number: 3:24-cv-03811-JSC

**[PROPOSED] ORDER GRANTING
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

Judge: Hon. Jacqueline Scott Corley

Hearing Date: October 3, 2024

Time: 10:00 AM

Courtroom: 8

1 Upon reviewing the legal arguments and evidence filed by Plaintiffs Concord Music
2 Group, Inc., Capitol CMG, Inc., Universal Music Corp., Songs of Universal, Inc., Universal Music
3 – MGB NA LLC, Polygram Publishing, Inc., Universal Music – Z Tunes LLC, and ABKCO Music,
4 Inc. (collectively, “Publishers”) in support of their Motion For Preliminary Injunction (“Motion”);
5 having reviewed the opposing legal arguments and evidence filed by Defendant Anthropic PBC
6 (“Anthropic”); having reviewed all reply materials and all argument of counsel; and having
7 considered the factors relating to (1) Publishers’ likelihood of success on the merits, (2) the
8 likelihood of irreparable harm to Publishers in the absence of preliminary injunctive relief, (3) the
9 balance of equities, and (4) the public interest, the Court HEREBY FINDS AND ORDERS as
10 follows:

11 Publishers are likely to prevail on the merits of their claim that Anthropic has directly
12 infringed Publishers’ copyrights, by reproducing Publishers’ copyrighted lyrics when training its
13 artificial intelligence (“AI”) models, and by reproducing, distributing, displaying, and preparing
14 derivative works based on Publishers’ copyrighted lyrics in the output of its AI models, all without
15 authorization, in violation of 17 U.S.C. §§ 106(1)-(3), (5). Anthropic is unlikely to succeed on its
16 fair use defense.

17 Publishers are likely to suffer irreparable harm absent a preliminary injunction, including
18 diminishment of Publishers’ control over their copyrighted works, denial of credit and goodwill,
19 harm to their reputations, erosion in the value of their works and the licensing market for those
20 works, damage to their position to negotiate future licenses, and harm to their relationships with
21 songwriters.

22 The balance of equities tips decidedly in Publishers’ favor. Whereas the threat of harm to
23 Publishers is substantial, Anthropic cannot claim any legitimate hardships from being forced to
24 desist from its infringing activities or from complying with the narrow injunctive relief sought.

25 The public interest weighs in favor of issuing the preliminary injunction, given the
26 compelling interest in protecting copyright owners’ rights and the economic incentive to continue
27 creating.

1 Accordingly, the Court hereby GRANTS Publishers’ Motion for Preliminary Injunction
2 and ORDERS the following preliminary injunctive relief:

3 1. Anthropic is ordered to maintain effective guardrails that prevent its current and
4 future AI models from generating output that reproduces, distributes, or displays the lyrics, in
5 whole or in part, to compositions owned or controlled by Publishers (including the compositions
6 listed in Exhibit A to the Complaint, Dkt. 1-3), or creates derivative works using those lyrics.

7 2. Anthropic, and all officers, principals, agents, servants, employees, affiliates,
8 licensees, transferees, purchasers, successors, and assigns, and all persons or entities acting on
9 their behalf or in active concert or participation with any of them and who receive actual notice of
10 this Preliminary Injunction, are enjoined and restrained from using copies of lyrics (or portions of
11 lyrics) to compositions owned or controlled by Publishers for future training of Anthropic’s AI
12 models (unless expressly authorized to do so by Publishers via license or other written agreement).

13 In order to facilitate compliance with this Preliminary Injunction, Publishers will provide
14 to Anthropic, within 30 days of the entry of this Order, an updated list of compositions owned or
15 controlled by Publishers, in addition to the 500 compositions identified in Exhibit A to the
16 Complaint, Dkt. 1-3. Publishers will update that list of compositions on at least a quarterly basis,
17 or as the parties otherwise agree.

18 Publishers are not required to post a security in connection with this Order. Publishers are
19 likely to succeed on the merits and face irreparable harm, and the limited injunctive relief is
20 unlikely to cause Anthropic significant financial hardship, therefore rendering security
21 unnecessary.

22 If Anthropic breaches any term of this Preliminary Injunction, Publishers will be entitled
23 to such relief as the Court deems just.

24 IT IS SO ORDERED.

25
26 Dated: _____, 2024

27 HON. JACQUELINE SCOTT CORLEY
UNITED STATES DISTRICT JUDGE