

JOSEPH KIRCHNER
Pro Se Plaintiff
4440 Parklawn Avenue
Edina, MN 55435
Legal@lawsofexistence.com
Tel: (612) 552-2122

**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

JOSEPH KIRCHNER,
Plaintiff,

Case No. 1:25-cv-02735-ACR

vs.

**NOTICE OF PLAINTIFF'S INTENT
TO CONTACT COPYRIGHT
HOLDERS REGARDING
ALLEGED INFRINGEMENT**

MIKE JOHNSON, in his individual and
official capacity as Speaker of the
United States House of Representatives;
DONALD J. TRUMP, in his individual
capacity as former and current President
of the United States;
PAM BONDI, in her individual and
official capacity as Attorney General of
the United States;
BRENDAN CARR, in his individual
and official capacity as Chairman of the
Federal Communications Commission;
THE UNITED STATES HOUSE OF
REPRESENTATIVES;
ANTHROPIC PBC;
OPENAI, INC.;
APPLE INC.;
COMCAST CABLE
COMMUNICATIONS, LLC;
METR (MODEL EVALUATION &
THREAT RESEARCH);
and DOES 1-20, unknown co-
conspirators,
Defendants.

Plaintiff Joseph Kirchner, proceeding pro se, respectfully submits this Notice to inform
the Court of Plaintiff's intent to contact copyright holders whose works may have been
reproduced without authorization by Defendant AI platforms.

I. Background

1. In the course of investigating Defendants' AI platforms for this litigation, Plaintiff documented instances where Defendant Anthropic PBC's Claude AI reproduced substantial portions of copyrighted musical compositions, including complete or near-complete song lyrics.

2. This evidence is documented in Exhibit C-18 ("Lyrical Content Obtained from Anthropic's Claude Sonnet 4.5"), which catalogs approximately 27 songs with lyrics reproduced by Claude during testing sessions on October 29-30, 2025, with additional instances captured in screen recordings. The documented sample represents a fraction of reproducible copyrighted content; Plaintiff's testing was curtailed by account throttling and suppression mechanisms that forced Plaintiff to choose between continuing copyright audits or developing pleadings for this litigation—resources did not permit both activities simultaneously.

3. The reproduced works include compositions owned or administered by major music publishing entities whose rights may be affected by this litigation.

II. COPYRIGHT HOLDERS TO BE CONTACTED

4. Plaintiff intends to provide notice of alleged infringement to the following copyright holders and rights administrators:

Entity	Works Affected
Sony Music Publishing	"The Red" (Chevelle), "Drive" (Incubus), "Thinking Out Loud" (Ed Sheeran), and others
Universal Music Publishing Group	"Heat Waves" (Glass Animals), "New Rules" (Dua Lipa), "Bad at Love" (Halsey), and others

Warner Music Group	"Lonely" (Justin Bieber), "Let It Go" (James Bay), and others
BMG Rights Management	Various compositions
Kobalt Music Publishing	Various compositions
Jobete Music Co. (Motown)	"Ain't No Mountain High Enough" (Marvin Gaye & Tammi Terrell)

5. The complete list of affected works and their respective copyright holders is detailed in Exhibit C-18 and Plaintiff's Copyright Notification Tracking documentation.

III. PURPOSE OF NOTIFICATION

6. Plaintiff's notification to copyright holders will:

(a) Provide notice of the alleged unauthorized reproduction of their copyrighted works by Defendant Anthropic PBC's AI systems;

(b) Request that copyright holders verify the accuracy of reproduced lyrics against their official registered versions, as alternative online sources contain subtle differences making it impossible for Plaintiff to determine the authoritative text without reference to officially registered works;

(c) Inform copyright holders of the pending litigation and their potential interest in the outcome;

(d) Advise copyright holders of their right to seek leave to file amicus curiae briefs or to seek intervention pursuant to Fed. R. Civ. P. 24 if they believe their interests are directly affected.

IV. RELEVANCE TO THIS LITIGATION

7. The copyright infringement evidence supports Plaintiff's claims by demonstrating:

(a) Defendants' AI systems contain and reproduce copyrighted content, proving the existence of training data that could include Plaintiff's intellectual property;

(b) Defendants' public representations regarding copyright compliance and content filtering are contradicted by documented reproduction of protected works;

(c) The selective enforcement of purported "safety" restrictions—which block Plaintiff's legitimate research while permitting copyright infringement—demonstrates discriminatory application of platform policies.

8. Plaintiff's legal analysis supporting these copyright infringement claims is set forth in Memorandum of Law C ("Constitutional Violation of Article I, Section 8 and Comprehensive Fair Use Defense Failure"), filed with the Amended Complaint (Doc. 13), which demonstrates Defendants' comprehensive failure on all four statutory fair use factors. The lyrical reproduction evidence documented herein is substantially identical in nature to evidence that resulted in a \$1.5 billion settlement in *Concord Music Group, Inc. v. Anthropic PBC*, No. 3:23-cv-01092 (M.D. Tenn.), underscoring the materiality of these copyright violations.

V. Request

9. WHEREFORE, Plaintiff respectfully requests that the Court:

(a) Accept this Notice as informing the Court of potential interested parties;

(b) Note that copyright holders may seek leave to participate as amici curiae or intervenors; and

1 (c) Grant such other relief as the Court deems appropriate.

2 Respectfully submitted,

3 
4 JOSEPH KIRCHNER

5 *Pro Se Plaintiff*

6 4440 Parklawn Avenue #203

7 Edina, MN 55435

8 legal@lawsofexistence.com

9 (612) 552-2122

10 Dated: January 20, 2026

11 CERTIFICATE OF SERVICE

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13 I hereby certify that on January 20, 2026, the foregoing Notice was filed via the Court's
14 CM/ECF system. As Defendants have not yet been served, no service copy was
15 transmitted.

16 
17 JOSEPH KIRCHNER

18 *Pro Se Plaintiff*