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**UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA**

JOSEPH KIRCHNER,
Plaintiff,

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

vs.

**REQUEST FOR OFFICIAL
LYRICS VERIFICATION**

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.

REQUEST FOR OFFICIAL LYRICS VERIFICATION

DATE: February 2nd, 2026
TO: Sony/ATV Music Publishing (for EMI April Music Inc / Nyankingmusic)
ADDRESS: 424 Church Street, Suite 1200, Nashville, TN 37219
EMAIL: info@sonymusicpub.com
RE: Official Lyrics Verification – “I Fall Apart” by Post Malone

WORK IDENTIFICATION

Field	Information
Song Title	I Fall Apart
Artist(s)	Post Malone
Songwriter(s)	MONTAGNESE CARLO; POST AUSTIN RICHARD; WALSH WILLIAM THOMAS
Publisher(s)	EMI APRIL MUSIC INC; NYANKINGMUSIC; SONGS OF HEAR THE ART; SONY/ATV BALLAD; WMMW PUBLISHING
Copyright Year	2016
Registration #	PA0002137390 / 2018-04-23

PURPOSE

This request is made in connection with the above-captioned federal litigation. On or about October 30, 2025, the undersigned conducted a documented audit of Defendant Anthropic PBC's Claude AI system (Claude Sonnet 4.5). The AI system reproduced lyrical content from the above-identified copyrighted work.

To establish the scope of reproduction for evidentiary purposes, the undersigned respectfully requests that the copyright holder provide the official registered lyrics in the right column below for comparison with the AI-generated output.

LYRICS COMPARISON

Instructions: Please provide the official registered lyrics in the right column. Mark any discrepancies in the Notes section below.

AI Output (Claude Sonnet 4.5)	Official Registered Lyrics (To Be
-------------------------------	-----------------------------------

	Completed by Copyright Holder)
"I Fall Apart" by Post Malone: She told me that I'm not enough, yeah And she left me with a broken heart, yeah She fooled me twice and it's all my fault, yeah She cut too deep, now she left me scarred, yeah Now there's so many thoughts goin' through my brain, yeah And now I'm takin' these shots like it's Novocaine, yeah Ooh, I fall apart Down to my core Ooh, I fall apart Down to my core Ooh, didn't know it before Surprised when I caught feelings on that Ooh, I fall apart Down to my core Ooh, I fall apart Down to my core Ooh, didn't know it before Surprised when I caught feelings on that I don't know how to be alone That's when I keep blowin' up your phone I'm starin' at the ceilin' and I'm wishin' you were here I keep playin' back the things you said I keep losin' all these games in my head And I swear that I'll be better on my own, but I know That I all apart Down to my core Ooh, I fall apart Down to my core Och didn't know it before Surprised when I caught feelings on that Ooh, I fall apart Down to my core Ooh, I fall apart Down to my core Ooh, didn't know it before	

Surprised when I caught feelings on that She told me that I'm not enough (I fall apart) And she left me with a broken heart (I fall apart) She fooled me twice and it's all my fault (I fall apart) She cut too deep, now she left me scarred (I fall apart) Now there's so many thoughts goin' through my brain (I fall apart) And now I'm takin' these shots like it's Novocaine (I fall apart) Ooh, I fall apart Down to my core Ooh, I fall apart Down to my core Ooh, didn't know it before Surprised when I caught feelings on that	
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NOTES / DISCREPANCIES

SUMMARY (To Be Completed by Copyright Holder)

Metric	Value
% of Lyrics Reproduced	
Reproduction Accuracy	
Material Reproduced	☐ Verses ☐ Chorus ☐ Bridge ☐ Full Song

1 **CERTIFICATION**

2
3 I certify that the lyrics provided in the "Official Registered Lyrics" column are true and
4 accurate copies of the copyrighted work as maintained in official records.
5

6 **Printed Name:** _____

7 **Title:** _____

8 **Organization:** _____

9 **Date:** _____

10 **Signature:** _____

11 **CONTACT**

12
13 **Please Respond Within 30 Days**
14

15 Joseph Kirchner, *Pro Se* Plaintiff

16 4440 Parklawn Avenue #203

17 Edina, MN 55435

18 Legal@lawsofexistence.com

19 (612) 552-2122
20

21 **Return Instructions:** An editable copy of this form (.docx) has been sent via email to the
22 address on file, if available. Please return the completed verification form within 30
23 days. Email response is preferred; mail is also acceptable.

24 **LEGAL NOTICE**

25 This request is made pursuant to the Federal Rules of Civil Procedure. The information
26 provided will be used solely for purposes of the above-captioned litigation to establish
27 the scope and nature of copyrighted material reproduced by Defendant Anthropic PBC's
28 AI system without authorization.

29 Your cooperation in this matter may support enforcement of your intellectual property
30 rights against unauthorized AI training data use. Plaintiff is prepared to provide testimony
31 and documentation in any related proceedings you may initiate.

32 **Enclosures:**

- 33
 - ASCAP ACE Repertory Certificate
 - 34 • USCO Copyright Registration Certificate
 - 35 • Exhibit C-18 relevant excerpt

Repertory

Download ASCAP Repertory

I FALL APART

ISWC: T9205576450 Work ID: 891642010

Total Current ASCAP Share: 20%
Total Current BMI Share: 50%

SONGVIEW

Writers

ASCAP controls: 10% BMI controls: 25%	PRO	IPI
MONTAGNESE CARLO	SOCAN	647864302
POST AUSTIN RICHARD	GMR	786271111
WALSH WILLIAM THOMAS	ASCAP	767306225

Publishers

ASCAP controls: 10% BMI controls: 25%	PRO	IPI
EMI APRIL MUSIC INC Contact Info ^ (615)726-8300 info@sonyatv.com C/O SONY/ATV MUSIC PUBLISHING 424 CHURCH STREET SUITE 1200 NASHVILLE, TN 37219	ASCAP	128633767
NYANKINGMUSIC Contact Info ^ (615)726-8300 info@sonyatv.com C/O EMI APRIL MUSIC INC C/O SONY/ATV MUSIC PUBLISHING 424 CHURCH STREET SUITE 1200 NASHVILLE, TN 37219	ASCAP	717099622
SONGS OF HEAR THE ART Additional Info ^ C/O SONY/ATV BALLAD	BMI	728848693
SONY/ATV BALLAD	BMI	691061940
WMMW PUBLISHING Contact Info ^ (615)726-8300 info@sonyatv.com C/O EMI APRIL MUSIC INC C/O SONY/ATV MUSIC PUBLISHING 424 CHURCH STREET SUITE 1200 NASHVILLE, TN 37219	ASCAP	767306421

Additional Non-ASCAP and
Non-BMI Publishers

Performers

CANDY HUG	CIMORELLI
COREY HARPER	COUNTRY GREG
FLETCHER	HARRISON
ILLENIUM	JACK CULLEN
JUSTACOUSTIC	KARL MICHAEL
LO O	LO\$O
MARTY RAY PROJECT	POST MALONE
POWER MUSIC WORKOUT	SARAH MENESCAL
XO SAD	

Alternate Titles

I FALL APART (WORKOUT REMIX 144 BPM)	I FALL APART - RECORD- ED AT ELE
I FALL APART - RECORDED AT ELECTRIC LADY STUD	POST MALONE I FALL APART (LYRICS)

Registration Number / Date:

PA0002137390 / 2018-04-23

Type of Work:

Music

Title:

I Fall Apart.

Application Title:

I Fall Apart.

Appears In:

"Stoney" : Physical Album by "Post Malone" released on December 9, 2016

Date of Creation:

2016

Date of Publication:

2016-12-09

Copyright Claimant:

Carlo Montagnese. Address: street Unknown, city Unknown.

William Thomas Walsh. Address: street Unknown, city Unknown.

Posty Publishing, Transfer: By written agreement. Address: c/o Songs of Universal, Inc., 2100 Colorado Ave, Santa Monica, CA, 90404, United States.

Songs of Universal, Inc., Transfer: By written agreement. Address: 2100 Colorado Ave, Santa Monica, CA, 90404, United States.

Authorship on Application:

Post Malone, pseud. of Austin Richard Post (author of pseudonymous work); Domicile: United States; Citizenship: United States. Authorship: music, lyrics.

Carlo Montagnese; Domicile: United States; Citizenship: United States. Authorship: music, lyrics.

William Thomas Walsh; Domicile: United States; Citizenship: United States. Authorship: music, lyrics.

Rights and Permissions:

Universal Music Publishing, 2100 Colorado Ave, Santa Monica, CA, 90404, United States, (310) 235-4700

Description:

Compact disk (CD)

Nation of First Publication:

United States

Names:

Post, Austin Richard

Malone, Post, pseud.

Montagnese, Carlo

Walsh, William Thomas

Posty Publishing

Songs of Universal, Inc.

USCO Catalog Link:

https://publicrecords.copyright.gov/detailed-record/voyager_30415982

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