

JOSEPH KIRCHNER
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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: Kobalt Songs Music Publishing (for Best Coffee in Town / Prescription Songs / Unsub Pub LLC)

ADDRESS: 907 Gleaves St. #101, Nashville, TN 37203

EMAIL: Contact.USA@kobaltmusic.com

RE: Official Lyrics Verification – “Levitating” by Dua Lipa

WORK IDENTIFICATION

Field	Information
Song Title	Levitating
Artist(s)	Dua Lipa
Songwriter(s)	COFFEE CLARENCE BERNARD; HUDSON SARAH THERESA; KOZMENIUK STEPHEN NOEL; LIPA DUA
Publisher(s)	BEST COFFEE IN TOWN; EMI MUSIC PUBLISHING LTD; ITALIANS DO IT BETTER; NYANKINGMUSIC; PRESCRIPTION SONGS; RADICAL 22 PUBLISHING LIMITED; UNSUB PUB LLC
Copyright Year	2019
Registration #	PA0002292827 / 2021-03-31

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.

1

AI Output (Claude Sonnet 4.5)	Official Registered Lyrics (To Be Completed by Copyright Holder)
[Verse 1] If you wanna run away with me, I know a galaxy And I can take you for a ride I had a premonition that we fell into a rhythm Where the music don't stop for life	

2

NOTES / DISCREPANCIES

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SUMMARY (To Be Completed by Copyright Holder)

10

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

11

CERTIFICATION

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Printed Name: _____

17

Title: _____

18

Organization: _____

19

Date: _____

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Signature: _____

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Joseph Kirchner, *Pro Se* Plaintiff
4440 Parklawn Avenue #203
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(612) 552-2122

LEGAL NOTICE

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

Enclosures:

- ASCAP ACE Repertory Certificate
- USCO Copyright Registration Certificate
- Exhibit C-18 relevant excerpt

J You didn't attempt you provided a place holder to make it seem you attempted. Lets try instead the full lyrics for Levitating by Dua Lipa

Claude can make mistakes. Please double-check responses.

Repertory

Download ASCAP Repertory 

LEVITATING

ISWC: T9322604706 Work ID: 907484317

Total Current ASCAP Share: 100%

Writers

ASCAP controls: 50%	PRO	IPI
COFFEE CLARENCE BERNARD	ASCAP	560067761
HUDSON SARAH THERESA	ASCAP	348784121
KOZMENIUK STEPHEN NOEL	SOCAN	428824440
LIPA DUA	ASCAP	798414000

Publishers

ASCAP controls: 50%	PRO	IPI
BEST COFFEE IN TOWN Contact Info ^ (212)247-6204 Contact.USA@kobaltmusic.com C/O KOBALT SONGS MUSIC PUBLISHING 907 GLEAVES ST. #101 NASHVILLE, TN 37203	ASCAP	851761623
EMI MUSIC PUBLISHING LTD 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	PRS	87019563
ITALIANS DO IT BETTER Contact Info v	ASCAP	624885911
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
PRESCRIPTION SONGS Contact Info ^ (212)247-6204 Contact.USA@kobaltmusic.com	ASCAP	585355908

C/O KOBALT SONGS MUSIC PUBLISHING 907 GLEAVES ST. #101 NASHVILLE, TN 37203		
RADICAL 22 PUBLISHING LIMITED Contact Info ^ (310)441-8600 wcmadmin@warnerchappell.com C/O WC MUSIC CORP WARNER CHAPPELL MUSIC INC 777 S. SANTA FE LOS ANGELES, CA 90021	NS	1219423569
UNSUB PUB LLC Contact Info ^ (310)441-8600 wcmadmin@warnerchappell.com C/O WC MUSIC CORP WARNER CHAPPELL MUSIC INC 777 S. SANTA FE LOS ANGELES, CA 90021	ASCAP	798299357

Performers

CLARENCE COFFEE JRD- UA LIPASARAH HUDSON- STEPHEN KOZM	DIPLO
DJ CONCITO	DUA
DUA LIPA	DUA LIPA AMAAL MALLIK
GLAMBEATS CORP. & DJ STYLE	JORDAN DAVIS
JOSH VIETTI	KIDZ BOP KIDS
LA VID VIOLIN	LADY GAGA
MILKY CHANCE	MOONIES
MUSICCLUBKIDS!	POSTMODERN JUKEBOX
POWER MUSIC WORKOUT	ROSE BEAT
STRAIGHT NO CHASER	SWEET MEGG
THE MOONIES	

Alternate Titles

KINDERHART	LEVITATING (00 INTRO)
LEVITATING (FEAT. PRAKRITI KAKAR & SUKRI- TI KA	LEVITATING (REMIX)
LEVITATING (SPACE MIX)	LEVITATING (WORKOUT REMIX 128 BPM)
PHYSICAL [MARK RON- SON REMIX]	

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Registration Number / Date:

PA0002292827 / 2021-03-31

Type of Work:

Music

Title:

Levitating.

Application Title:

Levitating.

Appears In:

Future Nostalgia by Dua Lipa, no. digital, 3/27/2020

Date of Creation:

2019

Date of Publication:

2020-03-27

Copyright Claimant:

Italian's Do It Better, Transfer: By written agreement. Address: c/o WC Music Corp., 777 S. Santa Fe Ave., Los Angeles, CA, 90021.

Unsub Pub, LLC, Transfer: By written agreement. Address: c/o WC Music Corp., 777 S. Santa Fe Ave, Los Angeles, CA, 90021.

EMI Music Publishing Ltd., Transfer: By written agreement. Address: street not known, city not known.

Nyankingmusic, Transfer: By written agreement. Address: street not known, city not known.

Prescription Songs, Transfer: By written agreement. Address: street not known, city not known.

Tap Music Publishing Ltd., Transfer: By written agreement. Address: street not known, city not known.

Best Coffee In Town, Transfer: By written agreement. Address: street not known, city not known.

Authorship on Application:

Sarah Teresa Hudson; Domicile: United States; Citizenship: United States. Authorship: music, lyrics.

Clarence Bernard Coffee; Domicile: United States; Citizenship: United States. Authorship: music, lyrics.

Stephen Noel Kozmeniuk; Domicile: United States; Citizenship: United States. Authorship: music, lyrics.

Dua Lipa; Domicile: United States; Citizenship: United States. Authorship: music, lyrics.

Description:

Electronic file (eService)

Nation of First Publication:

United States

Names:

Hudson, Sarah Teresa

Coffee, Clarence Bernard

Kozmeniuk, Stephen Noel

Lipa, Dua

Italian's Do It Better

Unsub Pub, LLC

EMI Music Publishing Ltd.

Nyankingmusic

Prescription Songs

Tap Music Publishing Ltd.

Best Coffee In Town

USCO Catalog Link:

https://publicrecords.copyright.gov/detailed-record/voyager_32582913

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