

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ATLANTIC RECORDING CORPORATION, BAD BOY RECORDS LLC, BIG BEAT RECORDS INC., ELEKTRA ENTERTAINMENT GROUP INC., ELEKTRA ENTERTAINMENT LLC, RHINO ENTERTAINMENT LLC, WARNER MUSIC INTERNATIONAL SERVICES LIMITED, WARNER MUSIC NASHVILLE LLC, WARNER RECORDS INC., COTILLION MUSIC, INC., GENE AUTRY'S WESTERN MUSIC PUBLISHING CO., UNICHAPPELL MUSIC INC., W CHAPPELL MUSIC CORP., W.C.M. MUSIC CORP., WARNER CHAPPELL MUSIC, INC., and WARNER-TAMERLANE PUBLISHING CORP.,

Plaintiffs,

v.

DESIGNER BRANDS INC., DSW SHOE WAREHOUSE, INC., TOPO ATHLETIC LLC, and DOES 1 through 10, inclusive,

Defendants.

CASE NO.:

JUDGE

COMPLAINT FOR:

- 1. DIRECT COPYRIGHT INFRINGEMENT**
- 2. CONTRIBUTORY COPYRIGHT INFRINGEMENT**
- 3. VICARIOUS COPYRIGHT INFRINGEMENT**

DEMAND FOR JURY TRIAL

Plaintiffs Atlantic Recording Corporation, Bad Boy Records LLC, Big Beat Records Inc., Elektra Entertainment Group Inc., Elektra Entertainment LLC, Rhino Entertainment LLC, Warner Music International Services Limited, Warner Music Nashville LLC, Warner Records Inc., Cotillion Music, Inc., Gene Autry's Western Music Publishing Co., Unichappell Music Inc., W Chappell Music Corp., W.C.M. Music Corp., Warner Chappell Music, Inc., and Warner-Tamerlane Publishing Corp. (individually, a "Plaintiff," and collectively, "Plaintiffs"), by and through their attorneys, allege as follows:

INTRODUCTION

1. Plaintiffs and their affiliated recorded music and music publishing companies are collectively known as Warner Music Group ("WMG"), which is home to legendary artists and songwriters and many of today's most popular hits. WMG produces, manufactures, distributes, sells, and licenses a legion of iconic and popular sound recordings and musical compositions, including musical works by Bruno Mars, Cardi B, Dua Lipa, Ed Sheeran, Fleetwood Mac, and Madonna.

2. Designer Brands Inc. and its subsidiaries DSW Shoe Warehouse, Inc. and Topo Athletic LLC (collectively "DSW" or "Defendants") are some of North America's largest designers, producers and retailers of footwear and accessories. They operate a portfolio of retail brands in the United States and Canada, including DSW Designer Shoe Warehouse, The Shoe Company, Topo, and Keds.

3. DSW is a sophisticated, 55-year-old company, with decades of experience licensing music for advertising – including a history of licensing music from WMG. DSW routinely relies upon intellectual property law to protect its own intellectual property. Yet when it comes to social media marketing and promotion, DSW has decided to use WMG's intellectual property without a license or other authorization.

4. Over recent years, DSW, like many retailers, has shifted much of its marketing focus from traditional advertising to promoting its products through social media platforms such as Instagram and TikTok, as well as via paid partnerships with well-known social media “influencers.”¹ Broadly speaking, an “influencer” is a person with a large social media following whose reputation and credibility enables them to influence consumers’ purchasing decisions or brand awareness. Knowing that popular music is the best way to capture the attention of its targeted audience, DSW and its social media influencers have incorporated many of Plaintiffs’ most valuable musical works into marketing and advertising videos for DSW’s products. These videos (each, a “DSW Video,” and collectively, the “DSW Videos”) are an integral part of DSW’s promotional, marketing, and branding strategy. DSW distributes the DSW Videos to the public via the various accounts that it maintains on a variety of social media platforms.

5. Even though DSW is a sophisticated party that has extensive experience with music licensing, DSW and its influencer partners have failed to seek permission or pay for the use of the sound recordings and musical compositions that are featured in the DSW Videos. To the contrary, Plaintiffs’ initial investigation has revealed that DSW misappropriated over **two hundred** of Plaintiffs’ popular and valuable musical works, using these musical works to attract attention to the DSW Videos, drive sales to DSW, and build DSW’s brand awareness and profile. Among the musical works infringed by DSW are some of the most popular sound recordings and musical compositions in the world, including, by way of example, “Up” by Cardi B, “Dreams” by Fleetwood Mac, “About Damn Time” by Lizzo, “Hung Up” by Madonna, and “Work it” by

¹ DSW’s social media advertising is similar to that of Vital Pharmaceuticals, Inc. d/b/a “Bang Energy,” an energy drink and sports nutrition supplement company that recently was found liable for copyright infringement in two different lawsuits due to the same type of copyright infringement alleged herein. See *UMG Recs., Inc. v. Vital Pharms., Inc.*, No. 21-CV-60914-CIV, 2022 WL 2670339 (S.D. Fla. July 11, 2022); *Sony Music Entm’t v. Vital Pharms., Inc.*, No. 21-22825-CIV, 2022 WL 4771858 (S.D. Fla. Sept. 14, 2022).

Missy Elliot (together with the other musical works listed on **Schedule A**, “Plaintiffs’ Works”). DSW not only failed to pay for the use of Plaintiffs’ Works, but by including these musical works in their promotional materials without Plaintiffs’ consent, DSW deprived Plaintiffs and the recording artists and songwriters that Plaintiffs represent of the ability to control how and where their musical works are used.

6. Defendants’ conduct has caused Plaintiffs substantial and irreparable harm. Plaintiffs bring this action to obtain redress for Defendants’ infringement of Plaintiffs’ valuable rights and to prevent further violations of those rights.

JURISDICTION AND VENUE

7. The Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a), insofar as this action arises under the Copyright Act of 1976, 17 U.S.C. §§ 101 *et seq.*

8. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b) and 1400(a).

9. The Court has personal jurisdiction over DSW because, among other things:
(a) DSW is an Ohio corporation with its principal place of business in this state and this District;
(b) Defendants have been doing business continuously in and maintain a regular presence in this state and this District; (c) a substantial part of the wrongful acts occurred within this state and this District, and (d) the effects of Defendants’ unlawful conduct are directed toward and felt in this state and this District.

THE PARTIES

Plaintiffs

10. Plaintiff Atlantic Recording Corporation is a Delaware corporation with its principal place of business at 1633 Broadway, New York, New York.

11. Plaintiff Bad Boy Records LLC is a Delaware limited liability company with its principal place of business at 1633 Broadway, New York, New York.

12. Plaintiff Big Beat Records Inc. is a Delaware corporation with its principal place of business at 1633 Broadway, New York, New York.

13. Plaintiff Elektra Entertainment Group Inc. is a Delaware corporation with its principal place of business at 1633 Broadway, New York, New York.

14. Plaintiff Elektra Entertainment LLC is a Delaware limited liability company with its principal place of business at 1633 Broadway, New York, New York.

15. Plaintiff Rhino Entertainment LLC is a Delaware limited liability company with its principal place of business at 777 S. Santa Fe Avenue, Los Angeles, California.

16. Plaintiff Warner Music International Services Limited is a limited company organized and existing under the laws of England and Wales, with its principal place of business at 27 Wrights Lane, London, England.

17. Plaintiff Warner Music Nashville LLC is a Tennessee limited liability company with its principal place of business at 20 Music Square East, Nashville, Tennessee.

18. Plaintiff Warner Records Inc. is a Delaware corporation with its principal place of business at 777 S. Santa Fe Avenue, Los Angeles, California.

19. Plaintiff Cotillion Music, Inc. is a Delaware corporation with its principal place of business at 777 S. Santa Fe Avenue, Los Angeles, California.

20. Plaintiff Gene Autry's Western Music Publishing Co. is a California corporation with its principal place of business at 777 S. Santa Fe Avenue, Los Angeles, California.

21. Plaintiff Unichappell Music Inc. is a Delaware corporation with its principal place of business at 777 S. Santa Fe Avenue, Los Angeles, California.

22. Plaintiff W Chappell Music Corp. is a California corporation with its principal place of business at 777 S. Santa Fe Avenue, Los Angeles, California.

23. Plaintiff W.C.M. Music Corp. is a Delaware corporation with its principal place of business at 777 S. Santa Fe Avenue, Los Angeles, California.

24. Plaintiff Warner Chappell Music, Inc. is a Delaware corporation with its principal place of business at 777 S. Santa Fe Avenue, Los Angeles, California.

25. Plaintiff Warner-Tamerlane Publishing Corp. is a California corporation with its principal place of business at 777 S. Santa Fe Avenue, Los Angeles, California.

Defendants

26. Defendant Designer Brands Inc. is an Ohio corporation with its principal place of business at 810 DSW Drive, Columbus, OH 43219.

27. Defendant DSW Shoe Warehouse, Inc. is a Missouri corporation and, upon information and belief, maintains its principal place of business in Ohio.

28. Defendant Topo Athletic LLC is a Delaware corporation with its principal place of business at 810 DSW Drive, Columbus, OH 43219. On December 13, 2022, DSW acquired a 79.4% ownership interest in Topo Athletic LLC.

29. On February 4, 2023, Defendants acquired the Keds brand, a popular footwear brand with an active social media presence.

30. Upon information and belief, Defendants Does 1 through 10 are subsidiaries, affiliates, agents, franchisees or representatives of DSW, and/or are otherwise responsible for and proximately caused and are causing the harm and damages alleged in this Complaint.

Plaintiffs presently are unaware of the true names and/or the involvement of the Defendants sued herein by the fictitious designations Does 1 through 10, and for that reason, sue them by those designations. Plaintiffs will seek leave to amend this Complaint to identify Does 1 through 10 when their true names and involvement in the infringements and other wrongful conduct hereinafter described are known.

ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

Plaintiffs and Their Copyrighted Works

31. Plaintiffs Atlantic Recording Corporation, Bad Boy Records LLC, Big Beat Records Inc., Elektra Entertainment Group Inc., Elektra Entertainment LLC, Rhino Entertainment LLC, Warner Music International Services Limited, Warner Music Nashville LLC, and Warner Records Inc. are engaged in the business of producing, marketing, promoting, distributing, selling, and/or licensing sound recordings to third parties for various kinds of uses, including for commercial use in posts on social media platforms.

32. Plaintiffs Cotillion Music, Inc., Gene Autry's Western Music Publishing Co., Unichappell Music Inc., W Chappell Music Corp., W.C.M. Music Corp., Warner Chappell Music, Inc., and Warner-Tamerlane Publishing Corp. are engaged in the business of developing, promoting, publishing, acquiring, administering, and/or licensing musical compositions, including for commercial use in posts on social media platforms.

33. Plaintiffs devote considerable effort to discovering and developing recording artists and songwriters; creating, advertising, promoting, selling, and licensing sound recordings embodying the performances of their exclusive recording artists; and developing, publishing, administering, and licensing their repertoire of musical compositions.

34. Plaintiffs' sound recordings and musical compositions are protected by copyright law, which grants the copyright owner the exclusive right to, among other things, reproduce, distribute, and create derivative works of copyrighted works; to publicly perform musical compositions; and to digitally transmit sound recordings to the public. An important portion of Plaintiffs' return on their investment in sound recordings and musical compositions comes from licensing sound recordings and musical compositions to others who use Plaintiffs' musical works in videos, films, television shows, commercials, video games, and on social media.

35. Additionally, many recording artists and songwriters do not permit their musical works to be used in advertising, or are extremely selective about such uses. Accordingly, a license for the use of Plaintiffs' musical works for advertising or promotional purposes can be extremely valuable, since Plaintiffs do not allow their musical works to be used by everyone who desires a license. The use of Plaintiffs' musical works in advertising and marketing without Plaintiffs' permission can have a significant impact on the overall value of those musical works and can harm the relationship between Plaintiffs and the recording artists and songwriters with whom they have contracted.

36. Attached as Schedule A is an illustrative, non-exhaustive list of sound recordings and musical compositions of which the identified Plaintiff is an owner or exclusive licensee in the United States of rights under copyright, which rights have been infringed by DSW, accompanied by the URLs of infringing DSW Videos featuring the sound recording or musical composition posted and maintained by DSW on one or more of its owned or operated social media channels. Each listed sound recording and musical composition reflected in Schedule A is registered with the United States Copyright Office.

37. Plaintiffs' investigation is continuing, and discovery is likely to reveal additional infringements. Plaintiffs intend to seek leave to amend this Complaint at an appropriate time to provide an expanded list of musical works infringed by Defendants.

Defendants' Infringing Conduct

38. DSW is one of North America's largest designers, producers and retailers of footwear and accessories. It was founded in 1969. During its 55-year history, DSW has repeatedly licensed music for promoting its brand and products in television commercials. Indeed, DSW has licensed music for its commercials from WMG in the past. Additionally, upon

information and belief, DSW obtains licenses to play music in its retail stores and/or otherwise licenses music in connection with its business activities.

39. For over a decade, social media has been a growing part of DSW's advertising model, where music has equally been at the forefront. In a 2012 article, DSW stressed that "[w]hen it comes to using social media as a selling tool, Designer Shoe Warehouse gets it. Social media is not an avenue for selling product, but a place to build a community."² A recent marketing campaign launched by DSW was described as: "com[ing] to life *through memorable, music-themed* experience," (emphasis added) and emphasizes the use of "emotional brand connection & content generation" as well as a "themed playlist" and "brand ambassadors, celebrity, VIP, influencer[s] & stylists".³

40. Upon information and belief, DSW devotes substantial resources to its social media advertising and promotional efforts, and, in order to build its profile on social media, DSW partners with social media influencers to promote its clothing and brands.

41. DSW has accordingly created multiple positions such as "Senior Influencer Marketing Specialist" and "Senior Content Creator," the latter of which is described as "a creative professional responsible for producing engaging social video content" and emphasizes "content creation, trend ideation, and video editing to enhance DSW's organic social initiatives." As part of its online advertising efforts, DSW not only maintains and operates numerous social media accounts of its own, with hundreds of thousands of online followers, but it also collaborates with social media influencers.

² <https://multichannelmerchant.com/marketing/dsw-builds-shoe-lover-community-with-social-media/>.

³ https://filecache.investorroom.com/ir1_dswinc/612/DBI_Investor%20Day%20Deck%20-%20Final.pdf.

42. Popular music is an important part of these social media and branding efforts. DSW's social media marketing team, as well as DSW's social media influencers and partners, have created and disseminated over two hundred infringing DSW Videos, which typically depict individuals showcasing DSW footwear, clothing and accessories, synchronized to an audio track of a popular commercially available sound recording and musical composition. The audio tracks generally run the full length of the DSW Video, and the DSW Video typically includes the most recognizable portion of the featured musical work, such as the chorus or hook. Upon information and belief, DSW maintains access to and/or tracks the posting and delivery of social media and other digital media materials throughout the company, including the infringing DSW Videos.

43. Upon information and belief, DSW's professional staff are directly involved in creating, reproducing, and/or distributing the DSW Videos. This includes (1) creating, commissioning, reviewing, and selecting videos for use on social media; (2) directly working with and overseeing social media influencers with whom DSW partners, including by providing advice and direction as to the content of the promotional videos; (3) specifically encouraging social media influencers to create video content and feature DSW products in their videos, including the infringing DSW Videos; and (4) actively reviewing influencer-made DSW Videos and then promoting and/or redistributing the videos by posting them on DSW's own social media pages.

44. In exchange for creating and distributing promotional videos, DSW provides its social media influencers with monetary compensation, either directly or through commissions and/or rebates (though, upon information and belief, contrary to Federal Trade Commission guidelines, the social media influencers often do not disclose that they receive compensation in any form). Upon information and belief, DSW enters into comprehensive contracts with many

leading social media influencers, including the influencers who are featured in the DSW Videos.

45. Although DSW has extensive experience with music licensing, DSW has blatantly failed to follow the law when it comes to using music in the DSW Videos posted on DSW's social media accounts. Plaintiffs have discovered over two hundred instances of unauthorized use of WMG's musical works.

46. Some examples include the following:

(a) **Figure 1** is a screen capture of a DSW Video created by or at the direction of DSW that was posted on DSW's TikTok account promoting "Barbie Inspired Looks with DSW" featuring the copyrighted work "Barbie World (with Aqua)" by Nicki Minaj, Ice Spice and Aqua.

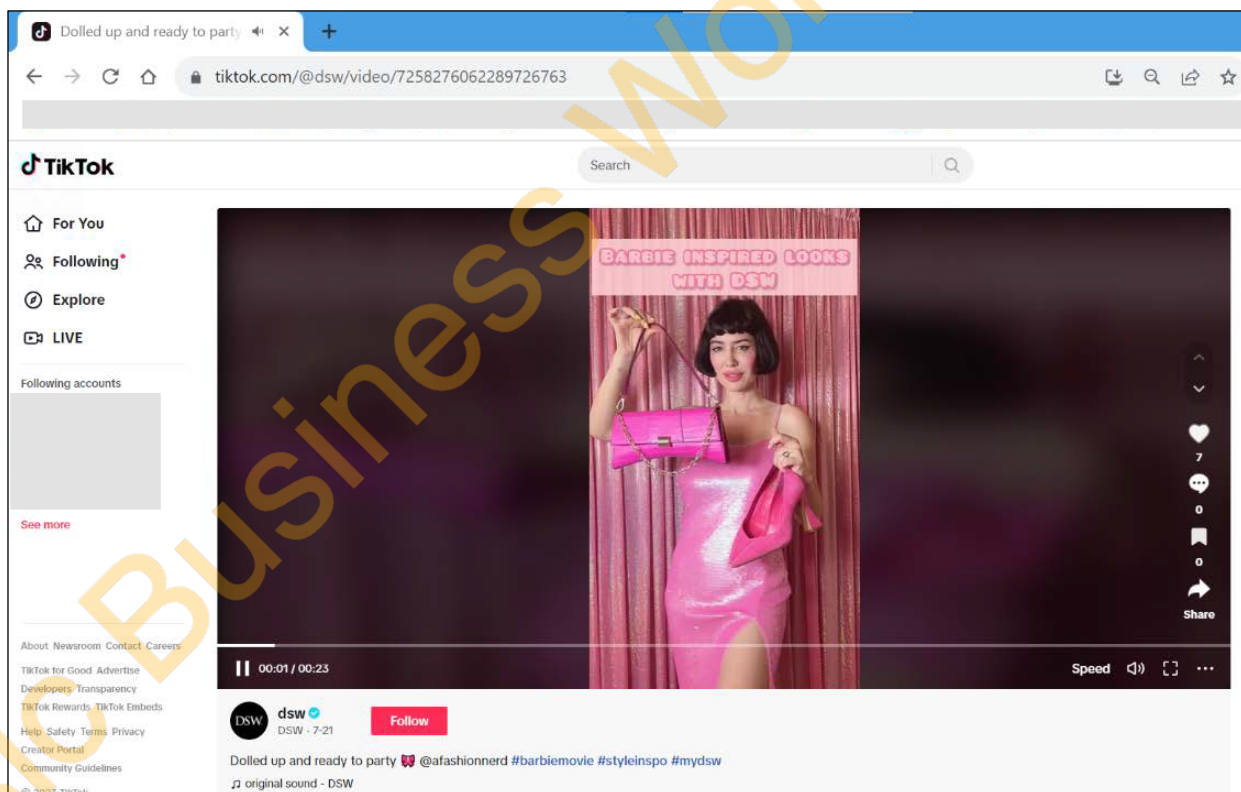


Figure 1

(b) **Figure 2** is a screen capture of a DSW Video posted on DSW's TikTok account with the caption "we know a certain concert these looks would be perfect for" featuring "Style" by Taylor Swift.

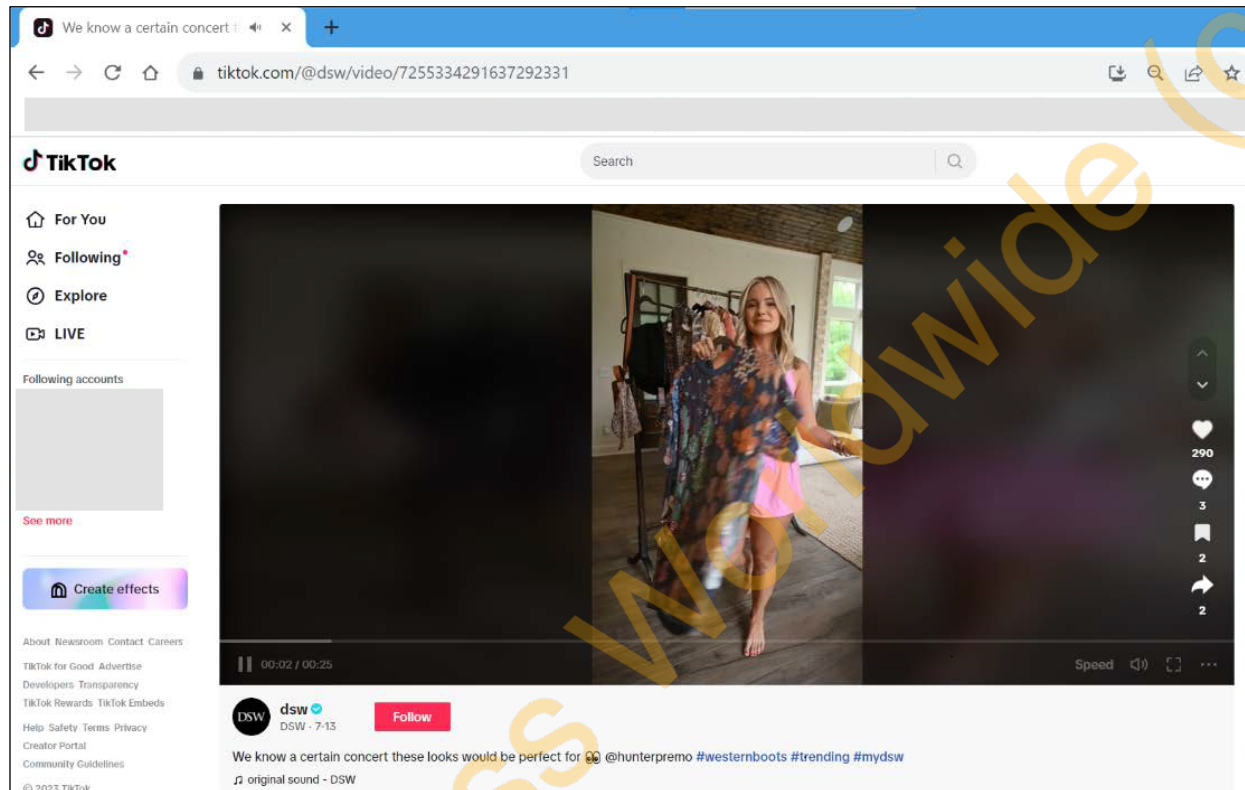


Figure 2

(c) **Figure 3** is a screen capture of a DSW Video posted on DSW's Instagram account under the heading "Yo Gotti • Pose (feat. Megan Thee Stallion, Lil Uzi Vert)." In it, a woman models various outfits featuring bright white sneakers, synchronized to 15 seconds of Yo Gotti's "Pose".

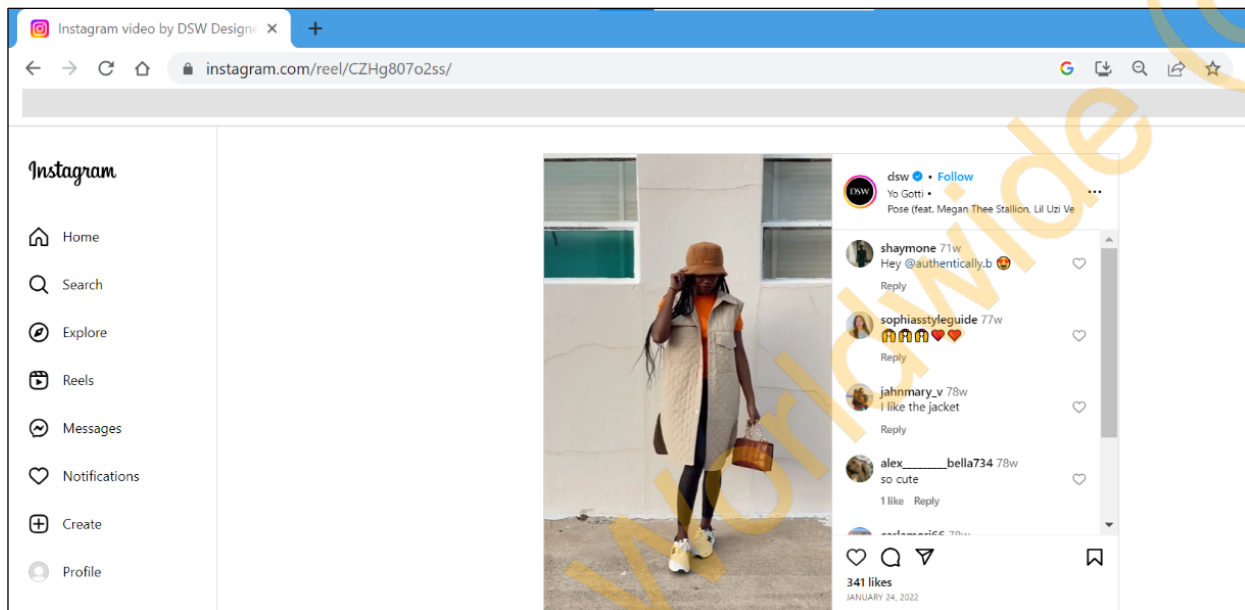


Figure 3

None of the foregoing uses were authorized by or licensed from Plaintiffs, and DSW did not compensate Plaintiffs in any manner for the unauthorized use of Plaintiffs' Works.

47. Recognizing the importance of music to their social media presence and brand, DSW's posts often specifically identify the Plaintiffs' Work featured in the DSW Videos (such as in **Figure 3** above, which features the heading "Yo Gotti • Pose (feat. Megan Thee Stallion, Lil Uzi Vert)"). On the other hand, many of the DSW Videos inexplicably purport to contain "Original audio" – notwithstanding the clear use of Plaintiffs' music.

48. DSW has furthered its global brand awareness through the broad dissemination of the infringing DSW Videos on social media. For example, DSW's Instagram account has **965 thousand** followers.

49. DSW's infringement was willful. DSW is a sophisticated company that, upon information and belief, has knowledge of copyright law, experience licensing music, and has availed itself of the judicial system to protect and enforce its own intellectual property rights. Moreover, the social media platforms on which DSW posted the infringing DSW Videos expressly state that account holders have no right to use music without proper authorization, and in particular, that music cannot be used in connection with commercial activities. For example, the Instagram Terms of Use incorporate "Music Guidelines," which are maintained in the "Legal" section of the Facebook website. Those Music Guidelines expressly provide as follows: "Use of music for commercial or non-personal purposes in particular is prohibited unless you have obtained appropriate licenses."⁴ Similarly, the TikTok Terms of Service unequivocally state that no rights are granted respecting use of sound recordings and musical works:

NO RIGHTS ARE LICENSED WITH RESPECT TO SOUND RECORDINGS AND THE MUSICAL WORKS EMBODIED THEREIN THAT ARE MADE AVAILABLE FROM OR THROUGH THE SERVICE.⁵

Upon information and belief, DSW was aware of these terms, but elected to ignore them.

50. Courts specifically have held that the same type of conduct engaged in by DSW constitutes copyright infringement. On July 11, 2022, United States District Judge William P. Dimitrouleas granted partial summary judgment to another music company, Universal Music Group, in its action against Bang Energy.⁶ In its order, the court found that it was "undisputed that [Bang Energy] posted approximately 140 TikTok videos utilizing portions of [Universal

⁴ *Terms of Use*, Instagram, <http://help.instagram.com/581066165581870> (incorporating Music Guidelines) (last visited April 29, 2025); *Music Guidelines*, Facebook, https://www.facebook.com/legal/music_guidelines (last visited April 29, 2025).

⁵ *Terms of Service*, TikTok, <https://www.tiktok.com/legal/terms-of-service?lang=en> (last visited April 29, 2025).

⁶ *UMG Recs.*, 2022 WL 2670339, at *7.

Music Group's] copyrighted works," and concluded that the Bang defendants were liable for direct copyright infringement as a matter of law.⁷ Similarly, on September 14, 2022, Judge Dimitrouleas granted partial summary judgment to another music company, Sony Music Entertainment, in its separate action against Bang Energy, concluding that the Bang defendants were liable for both direct and vicarious copyright infringement as a matter of law.⁸

COUNT I: COPYRIGHT INFRINGEMENT
(Against All Defendants)

51. Plaintiffs incorporate paragraphs 1 through 50 of this Complaint as if fully set forth herein.

52. Defendants' creation, posting/reposting, and/or streaming of the DSW Videos infringe Plaintiffs' copyrights. Among other things, Defendants have unlawfully reproduced, prepared derivative works from, distributed, publicly performed, and/or publicly performed by means of a digital audio transmission, the copyrighted works listed on Schedule A without authorization, in violation of 17 U.S.C. § 106(1), (2), (3), (4), and/or (6).

53. Defendants' acts of infringement have been knowing, deliberate, and willful, and in utter disregard for Plaintiffs' rights.

54. Thus, because Defendants directly posted the DSW Videos utilizing exact copies of portions of Plaintiffs' copyrighted works without authorization from Plaintiffs, Defendants are liable for direct copyright infringement. *See Sony*, 2022 WL 4771858, at *8 ("it is undisputed that Defendants directly posted approximately 286 social media videos utilizing portions of Plaintiffs' copyrighted works [without authorization] . . . Courts have found that the unauthorized reproduction, distribution and public performance of sound recordings via the

⁷ *Id.* at * 7.

⁸ *Sony*, 2022 WL 4771858, at *7-13.

internet violates the Copyright Act . . . Both elements of a direct copyright infringement claim having been established based upon the undisputed material facts . . . Plaintiffs are entitled to partial summary judgment against Defendants”).

55. As a direct and proximate result of Defendants’ infringement of Plaintiffs’ copyrights and exclusive rights under copyright, Plaintiffs are entitled to their actual damages, including Defendants’ profits from infringement, in amounts to be proven at trial, pursuant to 17 U.S.C. § 504(b). In the alternative, at Plaintiffs’ election pursuant to 17 U.S.C. § 504(c), Plaintiffs are entitled to the maximum statutory damages in the amount of \$150,000 with respect to each musical work infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c).

56. Plaintiffs are entitled to their costs, including reasonable attorneys’ fees, pursuant to 17 U.S.C. § 505.

57. Defendants’ conduct is causing, and, unless enjoined by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot be fully compensated or measured in money. Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. § 502, Plaintiffs are entitled to a permanent injunction prohibiting the infringement of Plaintiffs’ copyrights and exclusive rights under copyright.

COUNT II: CONTRIBUTORY COPYRIGHT INFRINGEMENT

(Against All Defendants)

58. Plaintiffs incorporate paragraphs 1 through 57 of this Complaint as if fully set forth herein.

59. As detailed above, the third-party social media influencers who created and distributed the DSW Videos have likewise infringed Plaintiffs’ copyrights, and Defendants are liable as contributory copyright infringers for the infringing acts of these influencers.

Additionally, or alternatively, Defendants are liable as contributory copyright infringers by making the DSW Videos available to the users and subscribers of the social media platforms referenced above.

60. By promoting and/or assisting with the creation of the infringing DSW Videos and/or by causing them to be copied, made available, and transmitted over the social media platforms referenced above, Defendants materially contributed to the infringing reproduction, preparation of derivative works, distribution, and/or public performance of the copyrighted works contained in the DSW Videos, including but not limited to the musical works listed in Schedule A. Defendants have actual and constructive knowledge of such infringement, including actual or constructive knowledge that no Plaintiff has granted the rights to include such Plaintiff's copyrighted musical works in the DSW Videos. In addition, Defendants have induced such infringement, including by promoting such infringement through the compensation paid to social media collaborators and other social media influencers, posting and/or reposting the infringing DSW Videos, and specifically referring to the sound recordings and musical compositions used in the infringing DSW Videos.

61. Defendants' acts of contributory infringement are knowing, deliberate, and willful, and in utter disregard for Plaintiffs' rights.

62. As a direct and proximate result of Defendants' contributory infringement of Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs are entitled to their actual damages, including Defendants' profits from infringement, in amounts to be proven at trial, pursuant to 17 U.S.C. § 504(b). In the alternative, at Plaintiffs' election pursuant to 17 U.S.C. § 504(c), Plaintiffs are entitled to the maximum statutory damages in the amount of \$150,000 with respect to each musical work infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c).

63. Plaintiffs are entitled to their costs, including reasonable attorneys' fees, pursuant to 17 U.S.C. § 505.

64. Defendants' conduct is causing, and, unless enjoined by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot be fully compensated or measured in money. Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. § 502, Plaintiffs are entitled to a permanent injunction prohibiting the contributory infringement of Plaintiffs' copyrights and exclusive rights under copyright.

COUNT III: VICARIOUS COPYRIGHT INFRINGEMENT

(Against All Defendants)

65. Plaintiffs incorporate paragraphs 1 through 64 of this Complaint as if fully set forth herein.

66. As detailed above, third-party social media influencers who created and distributed the DSW Videos have likewise infringed Plaintiffs' copyrights, and Defendants are vicariously liable for the infringing acts of these influencers. Additionally, or alternatively, Defendants are liable as vicarious copyright infringers by making the DSW Videos available to the users and subscribers of the social media platforms referenced above.

67. Defendants have exercised the right, ability, and authority to control and supervise the placement of the infringing DSW Videos on the social media platforms referenced above. Defendants also have the ability to remove the infringing DSW Videos from each platform. Defendants receive a direct financial benefit from the infringing reproduction, preparation of derivative works, distribution, and/or public performance of the copyrighted works contained in the DSW Videos, including but not limited to the musical works listed in Schedule A, including (among other financial benefits) increased brand recognition and product sales.

68. Defendants' acts of vicarious infringement are knowing, deliberate, and willful, and in utter disregard for Plaintiffs' rights.

69. Thus, because Defendants had the ability to control, supervise, and remove the infringing DSW Videos posted by third parties, and they received a direct financial benefit from the distribution and/or public performance of the copyrighted works contained in the infringing DSW Videos, Defendants are liable for vicarious copyright infringement.

70. As a direct and proximate result of Defendants' vicarious infringement of Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs are entitled to their actual damages, including Defendants' profits from infringement, in amounts to be proven at trial, pursuant to 17 U.S.C. § 504(b). In the alternative, at Plaintiffs' election pursuant to 17 U.S.C. § 504(c), Plaintiffs are entitled to the maximum statutory damages in the amount of \$150,000 with respect to each musical work infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c).

71. Plaintiffs are entitled to their costs, including reasonable attorneys' fees, pursuant to 17 U.S.C. § 505.

72. Defendants' conduct is causing, and, unless enjoined by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot be fully compensated or measured in money. Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. § 502, Plaintiffs are entitled to a permanent injunction prohibiting the vicarious infringement of Plaintiffs' copyrights and exclusive rights under copyright.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

(a) for a permanent injunction requiring that Defendants, and their officers, agents, employees, attorneys, and others in active concert or participation with each or any of them,

cease infringing, or causing, enabling, facilitating, encouraging, promoting, inducing, and/or participating in the infringement of, any of Plaintiffs' copyrights protected by the Copyright Act, whether now in existence or hereafter created;

(b) for Plaintiffs' actual damages and Defendants' profits from infringement, pursuant to 17 U.S.C. § 504(b), in amounts to be proven at trial, or, in the alternative, at Plaintiffs' election pursuant to 17 U.S.C. § 504(c), for statutory damages up to the maximum amount of \$150,000 per infringed musical work, or such other amounts as may be proper under 17 U.S.C. § 504(c);

(c) for Plaintiffs' costs, including reasonable attorneys' fees, pursuant to 17 U.S.C. §§ 505 and 1203(b)(4), (5) and otherwise;

(d) for pre-judgment and post-judgment interest; and

(e) for such other and further relief as the Court may deem just and proper.

Dated this 1st day of May, 2025.

Respectfully submitted,

BENSON & SESSER, LLC

/s/ Mark C. Melko

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DEMAND FOR JURY TRIAL

Plaintiffs Atlantic Recording Corporation, Bad Boy Records LLC, Big Beat Records Inc., Elektra Entertainment Group Inc., Elektra Entertainment LLC, Rhino Entertainment LLC, Warner Music International Services Limited, Warner Music Nashville LLC, Warner Records Inc., Cotillion Music, Inc., Gene Autry's Western Music Publishing Co., Unichappell Music Inc., W Chappell Music Corp., W.C.M. Music Corp., Warner Chappell Music, Inc., and Warner-Tamerlane Publishing Corp. hereby demand a trial by jury on all matters and issues so triable.

/s/ Mark C. Melko

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Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
SOUND RECORDINGS					
alt-J	Left Hand Free	SR0000770601	Atlantic Recording Corporation	DSW	https://www.instagram.com/stories/highlights/18286158043034708/
Anitta	Envolver	SR0001018107	Warner Records Inc.	The Shoe Company	https://www.instagram.com/reel/CdqzwSSFP67/
Baby Tate & Saweetie	Hey, Mickey!	SR0000959263	Warner Records Inc.	DSW	https://www.tiktok.com/@dsw/video/7217192743343279403
Beatrích	Superstar	SR0000939502	Warner Music International Services Limited	DSW	https://www.tiktok.com/@dsw/video/6990731912780287238
Bruno Mars	Talking to the Moon	SR0000671062	Elektra Entertainment Group Inc.	DSW	https://www.tiktok.com/@dsw/video/7015587521492995334
Bruno Mars, Anderson .Paak, Silk Sonic	After Last Night (with Thundercat & Bootsy Collins)	SR0000932350	Atlantic Recording Corporation	DSW	https://www.tiktok.com/@dsw/video/7205966222079462702
Bruno Mars, Anderson .Paak, Silk Sonic	Leave The Door Open	SR0000932365	Atlantic Recording Corporation	DSW	https://www.instagram.com/stories/highlights/17857772020776365/
Burna Boy	Last Last	SR0000931330	Atlantic Recording Corporation	DSW	https://www.tiktok.com/@dsw/video/7216377281193905454
CamelPhat & Elderbrook	Cola	SR0000918516	Big Beat Records Inc.	The Shoe Company	https://www.instagram.com/reel/CilNYfwgGce/
Cardi B	Up	SR0000934506	Atlantic Recording Corporation	DSW	https://www.tiktok.com/@dsw/video/6936250925820464389
Cassie	Long Way 2 Go	SR0000394687	Bad Boy Records LLC	The Shoe Company	https://www.tiktok.com/@theshoecompany_/video/7143259891614977286
Charli xcx	Speed Drive (From Barbie The Album)	SR0000968761/ SR0000975539	Atlantic Recording Corporation	DSW	https://www.tiktok.com/@dsw/video/7259393931752770858
Cher	Believe	SR0000261347	Warner Music International Services Limited	Keds	https://www.tiktok.com/@keds/video/7200482057682849070

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
Danity Kane	Show Stopper	SR0001014443	Bad Boy Records LLC	DSW	https://www.tiktok.com/@dsw/video/7202636184827252010
David Guetta & Bebe Rexha	I'm Good (Blue)	SR0000940861	Warner Music International Services Limited	DSW	https://www.instagram.com/reel/CohvjfPgfCQ/
Dua Lipa	Dance The Night (From Barbie The Album)	SR0001011873	Atlantic Recording Corporation	DSW	https://www.tiktok.com/@dsw/video/7267556441618222378
Dua Lipa	Levitating	SR0000902950	Warner Music International Services Limited	The Shoe Company	https://www.instagram.com/reel/COYo_t2B9Ge/
Dua Lipa	Levitating (feat. DaBaby) [Don Diablo Remix]	SR0001001469	Warner Music International Services Limited	DSW	https://www.instagram.com/reel/CL-dj0IA5HD/
Echosmith	Cool Kids	SR0000968318	Warner Records Inc.	The Shoe Company	https://www.instagram.com/reel/Cfo-0ZcAlrO/
Ed Sheeran	Shivers	SR0000935936	Warner Music International Services Limited	The Shoe Company	https://www.instagram.com/reel/C1xN5DLOcn8/
Eliza Rose & Interplanetary Criminal	B.O.T.A. (Baddest Of Them All)	SR0000940883	Warner Music International Services Limited	The Shoe Company	https://www.tiktok.com/@theshoecompany_/video/7145899973203201285
FIFTY FIFTY	Cupid (Twin Ver.)	SR0000993474	Warner Music International Services Limited	DSW	https://www.tiktok.com/@dsw/video/7221160801862700330
Fitz and The Tantrums	Out of My League	SR0000724442	Elektra Entertainment LLC	Topo	https://www.tiktok.com/@topoathletic/video/7253122875253591338
Fleetwood Mac	Dreams	N39857	Rhino Entertainment LLC	DSW	https://www.instagram.com/stories/highlights/18286158043034708/
Gorillaz	Feel Good Inc.	SR0000379134 / SRu000573812	Warner Music International Services Limited	The Shoe Company	https://www.instagram.com/reel/CrOvblbgvoe/
Icona Pop	I Love It (feat. Charli xcx)	SR0000723485	Atlantic Recording Corporation	DSW	https://www.instagram.com/reel/CdWd8x8gRnn/

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
Jack Harlow	First Class	SR0000927372	Atlantic Recording Corporation	DSW	https://www.instagram.com/reel/CfJobY9ABIm/
Jack Harlow	WHATS POPPIN	SR0000877565	Atlantic Recording Corporation	DSW	https://www.instagram.com/reel/ChM8sKiAoFD/
James Taylor	Carolina in My Mind	N38974	Rhino Entertainment LLC	DSW	https://www.instagram.com/stories/highlights/18095798182282761/
Jason Derulo	Acapulco	SR0000909583	Atlantic Recording Corporation	DSW	https://www.tiktok.com/@dsw/video/7046434984600538415
Jason Derulo	Whatcha Say	SR0000685175	Warner Records Inc.	DSW	https://www.instagram.com/reel/CnXDOWwIOoI/
Jessie James Decker	Should Have Known Better	SR0000934732	Warner Music Nashville LLC	DSW	https://www.instagram.com/reel/CbAwpsAgN93/
Kalii	Area Codes	SR0000959272	Atlantic Recording Corporation	DSW	https://www.tiktok.com/@dsw/video/7231928983833775406
Kiiara	Gold	SR0000928406	Atlantic Recording Corporation	The Shoe Company	https://www.pinterest.ca/pin/392868767508635956/
Leslie Odom, Jr., Lin-Manuel Miranda, Original Broadway Cast of Hamilton	A Winter's Ball	SR0000923673	Atlantic Recording Corporation	DSW	https://www.instagram.com/reel/CcWAZYsAskU/
Linkin Park	In the End	SR0000288402	Warner Records Inc.	DSW	https://www.tiktok.com/@dsw/video/7114718110556359978
Lizzo	About Damn Time	SR0000927976	Atlantic Recording Corporation	DSW	https://www.instagram.com/reel/CdeLeQ6AEof/
Lizzo	Boys	SR0000871754	Atlantic Recording Corporation	DSW	https://www.tiktok.com/@dsw/video/6905882497221987590
Lizzo	Juice	SR0000850617	Atlantic Recording Corporation	DSW	https://www.tiktok.com/@dsw/video/6966594804218170629
Lizzo	Rumors (feat. Cardi B)	SR0000927183	Atlantic Recording Corporation	DSW	https://www.instagram.com/stories/highlights/18095798182282761/
Lizzo	Special (feat. SZA)	SR0000954164	Atlantic Recording Corporation	DSW	https://www.tiktok.com/@dsw/video/7224149530202180907

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
Lykke Li	I Follow Rivers (The Magician Remix)	SR0000913999	Warner Music International Services Limited	The Shoe Company	https://www.instagram.com/reel/ClyvQ_tgz07/
Madonna	Hung Up	SR0000375278	Rhino Entertainment LLC	The Shoe Company	https://www.youtube.com/shorts/nqIG_25i928
Martin Solveig & Dragonette	Hello	SR0000754786	Big Beat Records Inc.	DSW	https://www.instagram.com/stories/highlights/18286158043034708/
Martin Solveig & GTA	Intoxicated	SR0000966671	Big Beat Records Inc.	DSW	https://www.instagram.com/reel/CgnGXaLAO9Q/
Michael Bublé	Holly Jolly Christmas	SR0000704271	Warner Records Inc.	DSW	https://www.instagram.com/reel/Ck3YDbsgJfl/
Michael Bublé	It's Beginning to Look a Lot like Christmas	SR0000704271	Warner Records Inc.	The Shoe Company	https://www.instagram.com/reel/C1NMPOXOHUg/
Michael Bublé	Sway	SR0000330696	Warner Records Inc.	DSW	https://www.instagram.com/reel/CeL65-GA4VW/
Missy Elliott	Get Ur Freak On	SR0000297686	Elektra Entertainment Group Inc.	The Shoe Company	https://www.instagram.com/reel/Ci2iYD_g7-4/
Missy Elliott	Work It	SR0000345855 / SR0000963755	Elektra Entertainment Group Inc.	DSW	https://www.instagram.com/reel/Ce62l6lgRTB/
Morten Harket	Can't Take My Eyes Off You	SR0000188251	Warner Records Inc.	DSW	https://www.instagram.com/reel/Cclfz25gaxq/
Oliver Tree & Robin Schulz	Miss You	SR0000939376	Atlantic Recording Corporation	DSW	https://www.tiktok.com/@dsw/video/7156235783488179502
Paolo Nutini	New Shoes	SR0000403474	Warner Music International Services Limited	The Shoe Company	https://www.instagram.com/reel/Cp23_o7p5Hu/
PinkPantheress & Ice Spice	Boy's a liar Pt. 2	SR0000954220	Warner Music International Services Limited	DSW	https://www.tiktok.com/@dsw/video/7211517807652113706
Saweetie	Best Friend (feat. Doja Cat & Katja Krasavice) [Remix]	SR0000904235	Warner Records Inc.	DSW	https://www.instagram.com/stories/highlights/17857772020776365/

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
Saweetie	Get It Girl (from Insecure: Music From The HBO Original Series, Season 5)	SR0000947216	Atlantic Recording Corporation	DSW	https://www.instagram.com/reel/Cb-3E-Wg98v/
Saweetie	My Type	SR0000848820	Warner Records Inc.	DSW	https://www.instagram.com/reel/Cg99kJLggfx/
Simple Plan	I'm Just a Kid	SR0000351060	Atlantic Recording Corporation	Keds	https://www.instagram.com/reel/CdTKLYNgVrX/
The Spinners	Could It Be I'm Falling in Love	N3465	Atlantic Recording Corporation	The Shoe Company	https://www.instagram.com/reel/CkOJuR3AqWH/
Tiësto & Ava Max	The Motto	SR0001010344	Atlantic Recording Corporation	Designer Brands	https://www.instagram.com/stories/highlights/17967860762124052/
Tones And I	Dance Monkey	SR0000875448	Elektra Entertainment Group Inc.	DSW	https://www.tiktok.com/@dsw/video/6968851250234379525
Wale	Poke It Out (feat. J. Cole)	SR0000945347	Warner Records Inc.	DSW	https://www.instagram.com/stories/highlights/18095798182282761/
MUSICAL COMPOSITIONS					
Ariana Grande	7 rings	PA0002191175	Warner-Tamerlane Publishing Corp.	The Shoe Company	https://www.instagram.com/reel/Celoc4HAOfL/
Ariana Grande	Santa Tell Me	PA0002017706	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7175168830698769706
Ariana Grande	Worst Behavior	PA0002436046	Warner-Tamerlane Publishing Corp.	Keds	https://www.instagram.com/reel/CpOUalpATrp/
Armani White	BILLIE EILISH.	PA0002417990	Warner-Tamerlane Publishing Corp.; Warner Chappell Music, Inc.	DSW	https://www.instagram.com/reel/CkBLS_gnK/N/
Ashanti	Foolish	PA0001263373	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/Cj24p2sAKjO/
Azealia Banks, Lazy Jay	212	PA0001769492	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7231249220529868075
Baby Tate & Saweetie	Hey, Mickey!	PA0002490193	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7217192743343279403

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
Berlin	Take My Breath Away (Love Theme from "Top Gun")	PA0000292409	W Chappell Music Corp.	Keds	https://www.tiktok.com/@keds/video/7405652281162714414
Beyoncé	AMERICA HAS A PROBLEM	PA0002375263	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7210775225850531114
Beyoncé	BREAK MY SOUL	PA0002375264	W Chappell Music Corp.	DSW	https://www.instagram.com/reel/Cf2CzrDgdee/
Beyoncé	Crazy In Love (feat. Jay-Z)	PA0001208972	Unichappell Music Inc.	DSW	https://www.instagram.com/reel/Cbk_i96g0ed/
Beyoncé	Crazy In Love (feat. Jay-Z)	PA0001208972	Unichappell Music Inc.	Keds	https://www.tiktok.com/@keds/video/7104306535467126062
Beyoncé	CUFF IT	PA0002375268	Warner-Tamerlane Publishing Corp.; W Chappell Music Corp.	Designer Brands	https://www.instagram.com/stories/highlights/18082019326323618/
Beyoncé	Formation	PA0002061475	Warner-Tamerlane Publishing Corp.; W Chappell Music Corp.	DSW	https://www.instagram.com/reel/Cgo2p-FARhi/
Beyoncé	MOVE (feat. Grace Jones & Tems)	PA0002375276	Warner-Tamerlane Publishing Corp.; W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7136233222718885163
Beyoncé	Naughty Girl	PA0001208974	W Chappell Music Corp.; Rightsong Music Inc.	DSW	https://www.instagram.com/reel/Cdf8VezgC6H/
Beyoncé	Partition	PA0001918144	Warner-Tamerlane Publishing Corp.; W Chappell Music Corp.	DSW	https://www.instagram.com/reel/Ca4-0oeggse/
Beyoncé	PURE/HONEY	PA0002375261	Warner-Tamerlane Publishing Corp.; W Chappell Music Corp.	DSW	https://www.instagram.com/reel/CocpZ2iA47h/
Beyonce	PURE/HONEY	PA0002375261	W Chappell Music Corp., Warner-Tamerlane Publishing Corp.	Keds	https://www.tiktok.com/@keds/video/7160710949685464362
Beyoncé	Yoncé - Homecoming Live	PA0001986580/ PA0002376949	Warner-Tamerlane Publishing Corp.; W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7242677891497004331

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
Beyoncé, Shakira	Beautiful Liar	PA0002490234	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7227103550197763370
Bill Withers	Lovely Day	PA0000027843	Warner-Tamerlane Publishing Corp.	The Shoe Company	https://www.instagram.com/reel/CifMNg5AMMI/
Bobby Helms	Jingle Bell Rock	EP0000113915 / RE0000234391	Warner Chappell Music, Inc.	The Shoe Company	https://www.instagram.com/reel/CmcfZxBoS7Z/
Brent Faiyaz	JACKIE BROWN	PA0002490181	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7211254136019651886
Bruno Mars	Talking to the Moon	PA0001869984	Warner Chappell Music, Inc.	DSW	https://www.tiktok.com/@dsw/video/7015587521492995334
Bruno Mars, Anderson .Paak, Silk Sonic	After Last Night (with Thundercat & Bootsy Collins)	PA0002459496	Warner Chappell Music, Inc.; W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7205966222079462702
Bruno Mars, Anderson .Paak, Silk Sonic	Leave The Door Open	PA0002314161	Warner Chappell Music, Inc.; W Chappell Music Corp.	DSW	https://www.instagram.com/stories/highlights/17857772020776365/
Cardi B	Up	PA0002394634	Warner-Tamerlane Publishing Corp.; W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/6936250925820464389
Carly Rae Jepsen	The Loneliest Time (feat. Rufus Wainwright)	PA0002483720	Warner-Tamerlane Publishing Corp.	The Shoe Company	https://www.instagram.com/reel/CkJg9jXAiAp/
cassö, RAYE & D-Block Europe	Prada	PA0002490235	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7265327921806593322
Cher	Believe	PA0000965807	W Chappell Music Corp.	Keds	https://www.tiktok.com/@keds/video/7200482057682849070
Ciara	Level Up	PA0002221124	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7148063625695989035
David Bowie	Under Pressure - Live	PA0000120531	Warner-Tamerlane Publishing Corp.	DSW	https://www.instagram.com/reel/Clv-zrTAcC4/
Dean Martin	Let It Snow! Let It Snow! Let It Snow!	EP136755/R542523/R560441	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/CIUryVRgmwV/

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
Diplo, SIDEPIECE	On My Mind - Do You Dance? Edit	PA0002361561	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7148066121986395435
DJ Khaled	Wild Thoughts (feat. Rihanna & Bryson Tiller)	PA0002082167	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/ClPbpV8ALoB/
DNA, Suzanne Vega	Tom's Diner	PA0000330888 / PA0000497749	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/CkwBSfDA6c8/
Doja Cat	Boss Bitch	PA0002310969	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/Chc-ABfg9GZ/
Doja Cat	Kiss Me More (feat. SZA)	PA0002304261	Warner-Tamerlane Publishing Corp.	The Shoe Company	https://www.instagram.com/reel/CQbPQjpBvju/
Doja Cat	Vegas (From the Original Motion Picture Soundtrack ELVIS)	PA0002377114	Warner-Tamerlane Publishing Corp.	DSW	https://www.instagram.com/reel/CgHrX3zACBW/
Dove Cameron	Boyfriend	PA0002344245	Warner-Tamerlane Publishing Corp.	DSW	https://www.instagram.com/reel/CbC5uj-ABfj/
Drake	Nice For What	PA0002230647	W Chappell Music Corp.	Topo	https://www.instagram.com/reel/BjfqAxCAqhZ/
Drake	Nonstop	PA0002228861	Warner-Tamerlane Publishing Corp.	DSW	https://www.instagram.com/reel/Cg69sTdA-D1/
Drake, 21 Savage	Rich Flex	PA0002391759	Warner-Tamerlane Publishing Corp.; W Chappell Music Corp.	DSW	https://www.instagram.com/reel/CnAPSgqIvZ3/
Dua Lipa	Dance The Night (From Barbie The Album)	PA0002428590	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7267556441618222378
Dua Lipa	Levitating	PA0002292827	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/COYo_t2B9Ge/
Dua Lipa	Levitating	PA0002292827	W Chappell Music Corp.	DSW	https://www.instagram.com/reel/CL-dj0IA5HD/
Duke Dumont	Ocean Drive	PA0002012376	W Chappell Music Corp.	DSW	https://www.facebook.com/DSW/videos/10154610697649306/

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
Echosmith	Cool Kids	PA0002385935	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/Cfo-0ZcAlrO/
Eliza Rose & Interplanetary Criminal	B.O.T.A. (Baddest Of Them All)	PA0002435734	W Chappell Music Corp.	The Shoe Company	https://www.tiktok.com/@theshoecompany_/video/7145899973203201285
Fat Joe	What's Luv? (feat. Ja-Rule & Ashanti)	PA0001146216/ PA0001671409	W Chappell Music Corp.	DSW	https://www.instagram.com/reel/CcA0rU_Ar2L/
Fat Joe	What's Luv? (feat. Ja-Rule & Ashanti)	PA0001146216/ PA0001671409	W Chappell Music Corp.	Keds	https://www.instagram.com/reel/CsmVS3mMPN0/
Fitz and The Tantrums	Out of My League	PA0001847257	W Chappell Music Corp.	Topo	https://www.tiktok.com/@topoathletic/video/7253122875253591338
Frank Sinatra	Let It Snow! Let It Snow! Let It Snow! (with the B. Swanson Quartet)	EP136755/R542 523/R560441	W Chappell Music Corp.	DSW	https://www.instagram.com/reel/Cl6L3_AzYw/
French Montana	Unforgettable (feat. Swae Lee)	PA0002099601	Warner-Tamerlane Publishing Corp.	The Shoe Company	https://www.instagram.com/reel/Cc1fYgtP_iw/
Fugees	Killing Me Softly With His Song	EU0000339027/ RE0000879477	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7241184077338938666
Gene Autry	Here Comes Santa Claus	EU0000100906/ R599517	Gene Autry's Western Music Publishing Co	The Shoe Company	https://www.instagram.com/reel/CmZMGUFgMuw/
Gnarls Barkley	Crazy	PA0001338240	Warner-Tamerlane Publishing Corp.	The Shoe Company	https://www.instagram.com/reel/CmIM7leg7CD/
GoldLink	Crew (feat. Brent Faiyz & Shy Glizzy)	PA0002100063	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/CbIRv1TrtKL/
Haddaway	What Is Love	PA0000787854	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7246458778550324522
Hailee Steinfeld	Most Girls	PA0002146327	Warner-Tamerlane Publishing Corp.; W Chappell Music Corp.	DSW	https://www.instagram.com/reel/Bat7ITIDUeK/

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
House Of Pain	Jump Around	PA0001719145	W Chappell Music Corp.	DSW	https://www.instagram.com/reel/CjVNzX2AvfM/
Ice Spice	In Ha Mood	PA0002447793	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7200444455885802798
J. Cole	Work Out	PA0001775270	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7241935728668593451
J. Cole, Trey Songz	Can't Get Enough	PA0001778257	Warner-Tamerlane Publishing Corp.	DSW	https://www.instagram.com/reel/CbqRxIDgadZ/
Jack Harlow	First Class	PA0002355942	W Chappell Music Corp.	DSW	https://www.instagram.com/reel/CfJobY9ABIm/
Jack Harlow	WHATS POPPIN	PA0002243488	Warner-Tamerlane Publishing Corp., W Chappell Music Corp.	DSW	https://www.instagram.com/reel/ChM8sKiAoFD/
Jeremih	oui	PA0002062913	Warner-Tamerlane Publishing Corp.	The Shoe Company	https://www.instagram.com/reel/CfHyr5tAd0A/
Jorja Smith	Little Things	PA0002490249	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7249777730718420266
Justin Timberlake	Cry Me a River	PA0001149534	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7260224448278711598
Justin Timberlake	Mirrors	PA0001915506	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7256907537977543979
Kaliii	Area Codes	PA0002490149	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7231928983833775406
Katy Perry	Last Friday Night (T.G.I.F)	PA0001753637	W Chappell Music Corp.	Keds	https://www.instagram.com/reel/CQgRDVsB9nd/
Kendrick Lamar	All The Stars (with SZA)	PA0002129609	Warner-Tamerlane Publishing Corp.	The Shoe Company	https://www.instagram.com/reel/Cl6VRwYAi0d/
Kendrick Lamar, Jay Rock	Money Trees	PA0001871263	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7236014810347982126
Keyshia Cole (feat. Missy Elliott & Lil' Kim)	Let It Go	PA0001589927	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7263109199985495338
Kiiara	Gold	PA0002070624	W Chappell Music Corp.	The Shoe Company	https://www.pinterest.ca/pin/392868767508635956/

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
Kool & The Gang	Celebration	PA0000411606	Warner-Tamerlane Publishing Corp., W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7171461086682647850
Kool & The Gang	Summer Madness	EP0000329126/ PA0000845531	Warner-Tamerlane Publishing Corp., W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/6976624973234408710
Lady Gaga	Bloody Mary	PA0001757746	Warner-Tamerlane Publishing Corp.	DSW	https://www.instagram.com/reel/CnexyYjIPYq/
Lady Gaga	Born This Way	PA0001757756	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7241568638510157098
Leona Lewis	Better In Time	PA0001609111	Warner Chappell Music, Inc.	Topo	https://www.instagram.com/reel/C4IvWh3MEly/
Leslie Odom, Jr., Lin-Manuel Miranda, Original Broadway Cast of Hamilton	A Winter's Ball	PA0001989311/ PA0001398281	W Chappell Music Corp.	DSW	https://www.instagram.com/reel/CcWAZYsAskU/
Libianca	People	PA0002490244	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7235449638805982506
Lil Wayne	Lollipop (feat. Static Major)	PA0001619781	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7237108979321539882
Lizzo	About Damn Time	PA0002370686	Warner Chappell Music, Inc.	DSW	https://www.instagram.com/reel/CdeLeQ6AEof/
Lizzo	Boys	PA0002292950	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/6905882497221987590
Lizzo	Juice	PA0002293037	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/6966594804218170629
Lizzo	Rumors (feat. Cardi B)	PA0002343373	Warner Chappell Music, Inc.; W Chappell Music Corp.	DSW	https://www.instagram.com/stories/highlights/18095798182282761/
Lizzo	Special (feat. SZA)	PA0002378503	Warner Chappell Music, Inc.; W Chappell Music Corp., Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7224149530202180907

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
Madonna	Back That Up To The Beat - demo version	PA0002435684	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/CocuW3IJ2kw/
Madonna	Hung Up	PA0001162837	W Chappell Music Corp.	The Shoe Company	https://www.youtube.com/shorts/nqIG_25i928
Mariah Carey	Heartbreaker (Remix) [feat. Missy Elliott & Da Brat]	PA0000996562	W Chappell Music Corp.	Topo	https://www.instagram.com/reel/C7MWG4HMFvH/ https://www.tiktok.com/@topoathletic/video/7371092889784438059
Martin Garrix	Summer Days (feat. Macklemore & Patrick Stump)	PA0002197113	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/6958044294083087622
Martin Garrix	Summer Days (feat. Macklemore & Patrick Stump)	PA0002197113	W Chappell Music Corp.	Keds	https://www.instagram.com/reel/CfEmShaABtS/
Matt Corman	Put Em in They Place	PA0002516775	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7324712071881592110
Metro Boomin	Trance (with Travis Scott & Young Thug)	PA0002490221	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7241251536146500910
Michael Gray	The Weekend - Radio Edit	PA0001275238	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/CWTdgTHg1HF/
Michael Jackson	Thriller	PA0000162442	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/CkYnXM3gCBd/
Mila J	Kickin' Back	PA0002042829	Warner-Tamerlane Publishing Corp., W Chappell Music Corp.	DSW	https://www.instagram.com/reel/CkTMwFoAPLW/
Missy Elliott	Get Ur Freak On	PA0001146413	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/Ci2iYD_g7-4/
Nappy Roots	Good Day	PA0001627399	Warner-Tamerlane Publishing Corp.	The Shoe Company	https://www.instagram.com/stories/highlights/17862651931531321/
Nelly	Dilemma (feat. Kelly Rowland)	PA0001073273	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7142924579382791470

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

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Nicki Minaj	Itty Bitty Piggy	PA0002466565	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7207835683900165422
Nicki Minaj, Ice Spice, Aqua	Barbie World (with Aqua) [From Barbie The Album]	PA0002471371	Warner-Tamerlane Music Corp., W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7257250357615529262
Nicky Youre, dazy	Sunroof (feat. Thomas Rhett)	PA0002379295	Warner-Tamerlane Music Corp., W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7129543296678087982
Ocean Alley	Confidence	PA0002516954	W Chappell Music Corp.	Topo	https://www.instagram.com/reel/C1rsRocs7Y_/
Oliver Tree & Robin Schulz	Miss You	PA0002490231	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7156235783488179502
Olivia Rodrigo	good 4 u	PA0002404776	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/6986690345371258118
Paolo Nutini	New Shoes	PA0001644758	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/Cp23_o7p5Hu/
Parcels	Lightenup- from Hansa Studios, Berlin	PA0002490240	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/C3vRAmKO8_C/
PinkPantheress & Ice Spice	Boy's a liar Pt. 2	PA0002436037	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7211517807652113706
Pitbull	Hotel Room Service	PA0001677761	Warner-Tamerlane Publishing Corp.	The Shoe Company	https://www.instagram.com/reel/CqxwAF0gKd8/
Ralph Castelli	Morning Sex	PA0002394626	W Chappell Music Corp.	Topo	https://www.instagram.com/reel/CzGzd2LsHnJ/
Rema	Calm Down	PA0002435681	W Chappell Music Corp.	The Shoe Company	https://www.tiktok.com/@theshoecompany_/video/7228229193660763398
Ricky Martin	Livin' la Vida Loca	PA0000967146	Warner-Tamerlane Publishing Corp.	DSW	https://www.instagram.com/stories/highlights/18286158043034708/
Rihanna	Pon de Replay	PA0001311248	Warner-Tamerlane Publishing Corp., W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/Cih6bxPgr3L/
Rihanna	Where Have You Been	PA0001801575	Unichappell Music Inc.	DSW	https://www.instagram.com/reel/Cpkpwongj2y/

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

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Rihanna, JAY-Z	Umbrella	PA0001602373	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/CkgTEHLAKVP/
Russ	3:15 (Breathe)	PA0002104393	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7259760282447187242
Sage The Gemini, Iamsu!	Gas Pedal	PA0001919279	Warner-Tamerlane Publishing Corp.	DSW	https://www.instagram.com/reel/Cba1Qc0g79D/
Sam Smith	Unholy (feat. Kim Petras)	PA0002381391	Warner-Tamerlane Publishing Corp.; W Chappell Music Corp.	DSW	https://www.instagram.com/reel/CkjtpkWg2qr/
Saweetie	Best Friend (feat. Doja Cat)	PA0002291322	W Chappell Music Corp.	DSW	https://www.instagram.com/stories/highlights/17857772020776365/
Saweetie	Get It Girl (from Insecure: Music From The HBO Original Series, Season 5)	PA0002490238	Warner-Tamerlane Publishing Corp.	DSW	https://www.instagram.com/reel/Cb-3E-Wg98v/
Saweetie	My Type	PA0002238407	W Chappell Music Corp.	DSW	https://www.instagram.com/reel/Cg99kJLggfx/
Simple Plan	I'm Just a Kid	PA0001084655	W Chappell Music Corp.	Keds	https://www.instagram.com/reel/CdTKLYNgVrX/
Soulja Boy	Pretty Boy Swag	PA0001734530	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7156316023803743531
Stacey Ryan	Fall In Love Alone	PA0002436042	Warner-Tamerlane Publishing Corp.; W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/C35k1hPOkln/
SZA	Good Days	PA0002333973	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7100933312771837227
SZA	Kill Bill	PA0002397976	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7200070036185156906
SZA	Kill Bill	PA0002397976	Warner-Tamerlane Publishing Corp.	Keds	https://www.tiktok.com/@keds/video/7194567614470065454
SZA	Snooze	PA0002451534	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7199661900639063342
Taylor Swift	Style	PA0001981838	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7255334291637292331

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

Artist	Work Title	Registration Number	Plaintiff(s)	Posted By	URL(s)
The Love Unlimited Orchestra	Love's Theme	EU0000433739/ RE0000841846	Unichappell Music, Inc.	The Shoe Company	https://www.instagram.com/reel/C3qfKt4ODTV/
The Spinners	Could It Be I'm Falling in Love	EP309686	Warner-Tamerlane Publishing Corp.	The Shoe Company	https://www.instagram.com/reel/CkOJuR3AqWH/
The Weeknd	After Hours	PA0002237665	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7223012762530729258
The Weeknd	Out of Time	PA0002360409	W Chappell Music Corp.	The Shoe Company	https://www.instagram.com/reel/C2RJ39auzi0/
The Weeknd	Popular (with Playboi Carti & Madonna)	PA0002437489	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7265702489310121259
The Weeknd	The Hills	PA0001986818 / PA0001398369	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7212999504230944043
Tiësto & Ava Max	The Motto	PA0002338080	W Chappell Music Corp.; Warner Chappell Music, Inc.	Designer Brands	https://www.instagram.com/stories/highlights/17967860762124052/
Tones And I	Dance Monkey	PA0002203186	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/6968851250234379525
Tove Lo	Habits	PA0002490237	W Chappell Music Corp.	DSW	https://www.tiktok.com/@dsw/video/7078287479266299182
Tyler, The Creator	Lone	PA0001993158	W Chappell Music Corp.	Topo	https://www.instagram.com/reel/DA8eeAjvhIx/
Usher	Burn - Radio Mix	PA0001159079	W.C.M. Music Corp.	DSW	https://www.tiktok.com/@dsw/video/6918360953511890182
Usher	U Don't Have to Call	PA0000846616	Warner Chappell Music, Inc.	DSW	https://www.tiktok.com/@dsw/video/7216377281193905454
Vanessa Hudgens	Come Back to Me	PA0001661428	Unichappell Music Inc.	Keds	https://www.tiktok.com/@keds/video/7093176145981476142
Wale	Poke It Out (feat. J. Cole)	PA0002341514	W Chappell Music Corp.; Unichappell Music Inc.	DSW	https://www.instagram.com/stories/highlights/18095798182282761/

Schedule A

Representative WMG Copyrighted Works Infringed by DSW

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Wham!	Last Christmas	PA0000296385	Warner Chappell Music, Inc.	The Shoe Company	https://www.instagram.com/reel/CmbyNDUIpqi/ https://www.instagram.com/reel/ClrDGkygNxP/ https://www.tiktok.com/@dsw/video/7308753974671215903 https://www.instagram.com/reel/CmHJ2Engd6r/
Whitney Houston	How Will I Know	PA0000243349/ PA0000266437	W Chappell Music Corp.	The Shoe Company	https://www.pinterest.ca/pin/392868767510131578/
Yo Gotti	Down In the DM	PA0002018333	Warner-Tamerlane Publishing Corp.	DSW	https://www.instagram.com/reel/CoNEa6Egdtr/
Yo Gotti	Pose (feat. Megan Thee Stallion & Lil Uzi Vert)	PA0002238932	W Chappell Music Corp.	DSW	https://www.instagram.com/reel/CZHg807o2ss/
Young-Holt Unlimited	Soulful Strut	EP254603 / EP254020 / EP256052	Warner-Tamerlane Publishing Corp.; Unichappell Music, Inc.	The Shoe Company	https://www.instagram.com/reel/CI39-0tAF3d/
Young-Holt Unlimited	Soulful Strut	EP254603 / EP254020 / EP256052	Warner-Tamerlane Publishing Corp.; Unichappell Music Inc.	Keds	https://www.tiktok.com/@keds/video/7384168668378189102 https://www.instagram.com/reel/CoC62EzgfoZ/
Yung Bae	L.O.V.E. (feat. EARTHGANG, Jon Batiste & Sherwyn)	PA0002369194	Warner-Tamerlane Publishing Corp.	DSW	https://www.tiktok.com/@dsw/video/7164076519805979950
Yung Gravy	Betty (Get Money)	PA0000375327	Warner-Tamerlane Publishing Corp.	DSW	https://www.instagram.com/reel/CilAmPqA8rF/