Court File No. T-3803-26

FEDERAL COURT

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FEDERAL COURT
COUR FÉDÉRALE
DÉPOSÉ
November 18, 2026
18 novembre 2026
Plaintiff
Cherlin McColman
TOR 8

B E T W E E N:

SOCIETY OF COMPOSERS, AUTHORS AND MUSIC PUBLISHERS OF CANADA

and

SUNO, INC.

Defendant

AMENDED STATEMENT OF CLAIM

Amended November 18, 2026, pursuant to Rule 200 of the *Federal Courts Rules*

TO THE DEFENDANT:

A LEGAL PROCEEDING HAS BEEN COMMENCED AGAINST YOU by the plaintiff. The claim made against you is set out in the following pages.

IF YOU WISH TO DEFEND THIS PROCEEDING, you or a solicitor acting for you are required to prepare a statement of defence in Form 171B prescribed by the *Federal Courts Rules*, serve it on the plaintiff's solicitor or, if the plaintiff does not have a solicitor, serve it on the plaintiff, and file it, with proof of service, at a local office of this Court

WITHIN 30 DAYS after the day on which this statement of claim is served on you, if you are served in Canada or the United States; or

WITHIN 60 DAYS after the day on which this statement of claim is served on you, if you are served outside Canada and the United States.

TEN ADDITIONAL DAYS are provided for the filing and service of the statement of defence if you or a solicitor acting for you serves and files a notice of intention to respond in Form 204.1 prescribed by the *Federal Courts Rules*.

Copies of the *Federal Courts Rules*, information concerning the local offices of the Court and other necessary information may be obtained on request to the Administrator of this Court at Ottawa (telephone 613-992-4238) or at any local office.

IF YOU FAIL TO DEFEND THIS PROCEEDING, judgment may be given against you in your absence and without further notice to you.

September 2, 2026

Amended November 18, 2026

Issued by: _____

Address of local office: 200 - 180 Queen Street West
Toronto ON M5V 3L6

TO: Suno, Inc.
17 Dunster Street
Cambridge MA 02138
USA

CLAIM

1. The plaintiff, Society of Composers, Authors and Music Publishers of Canada ("SOCAN"), seeks

a. a declaration that the defendant, Suno, Inc. ("Suno"), has infringed and authorized the infringement of SOCAN's Performing Rights (as defined at paragraph 5 below) in the Listed Works (as defined at paragraph 7 below), and in additional SOCAN Works (as defined at paragraph 5 below) to be identified through this litigation, contrary to the *Copyright Act*, R.S.C. 1985, c. C-42;

b. orders for

i. damages, and in addition to those damages, any and all profits that Suno has made from its infringement of SOCAN's Performing Rights, pursuant to section 35 of the *Copyright Act*, in amounts to be determined at trial,

ii. in the alternative to (i), if SOCAN so elects, statutory damages in the amount of $20,000 for each SOCAN Work in which Suno has infringed SOCAN's Performing Rights, pursuant to paragraph 38.1(1)(a) of the *Copyright Act*, and

iii. punitive and exemplary damages in the amount of $10,000,000 for Suno's wilful and knowing infringement of SOCAN's Performing Rights;

c. a permanent injunction pursuant to section 34 of the *Copyright Act* prohibiting Suno, its parents, subsidiaries, and affiliates, their

respective agents, employees, officers, directors, servants, successors, licensees, heirs, and assigns, and any person or entity directly or indirectly controlled by or acting on behalf of or under the authority of any of the foregoing, from infringing SOCAN's Performing Rights in the Listed Works and any other SOCAN Works in which Suno is found to have infringed SOCAN's Performing Rights, including by performing any of those SOCAN Works, in whole or substantial part, in public, communicating them to the public by telecommunication, including by making them available by telecommunication in a way that allows a member of the public to have access to them from a place and at a time individually chosen by that member of the public, or authorizing such acts;

d. a wide injunction, pursuant to section 39.1 of the *Copyright Act*, prohibiting Suno and any other person or entity referred to in subparagraph 1.c from infringing SOCAN's Performing Rights in any other work that now exists or later comes into existence, in which SOCAN is now, or later becomes, an owner of Performing Rights or any interest in them, including by engaging in any of the acts listed in subparagraph 1.c;

e. pre-judgment and post-judgment interest at the maximum allowable rate;

f. the costs of this action on the highest allowable scale, plus all applicable taxes; and

g. such further and other relief as the Court may deem just.

I. Overview

2. This case is about a simple principle: technological innovation does not displace copyright. Suno's entry into the music industry may be powered by cutting-edge artificial intelligence (AI), but the foundation its technology is built on—the work of human authors—is protected by copyright. The laws that protect music creators and music publishers apply equally in the age of generative AI.

3. Suno has developed and released, and now operates for commercial purposes, a mass-marketed AI music-generation and streaming service (the "Suno Platform"). The Suno Platform is powered by Suno's AI models (collectively, the "Suno Model"). By Suno's own account, it trained the Suno Model on virtually all music files of reasonable quality that are accessible on the Internet, without permission or licences to do so.

4. Through the Suno Platform, Suno generates near-professional-quality musical outputs, essentially instantaneously, in response to user prompts. It makes those outputs available for on-demand streaming on the Suno Platform, both by the user and by the public at large. It also encourages users with paid accounts to upload Suno outputs to third-party streaming services, such as Spotify, Apple Music, and YouTube, and encourages all users to embed Suno outputs onto third-party websites.

5. The SOCAN repertoire consists of millions of songs and other musical compositions ("musical works"), including both music and lyrics, created by its members and by foreign rightsholders affiliated with more than 100 different collective societies in some 195 territories around the world. SOCAN owns or administers the right to perform those musical works in public, in Canada, including the right to communicate them to the public by telecommunication, to make them available to the

public on demand, and to authorize those acts ("Performing Rights"). The musical works in which SOCAN owns or administers Performing Rights are referred to in this statement of claim as the "SOCAN Works".

6. Because the Suno Model was trained on a massive number of musical works, Suno is able to generate, in response to prompts by users, outputs that are identical or substantially similar to those works. It then provides on-demand access to those outputs both to those users and to the general public.

7. Appendix "A" sets out a list of certain outputs that Suno has made available to the public and that are identical or substantially similar to SOCAN Works. For the purposes of this litigation, those outputs are referred to as the "Listed Outputs" and the corresponding SOCAN Works are referred to as the "Listed Works".

8. But the Listed Outputs are just the tip of the iceberg. Suno also makes available to the public, on demand, many more SOCAN Works that it has used to train the Suno Model. It does so by offering to generate, or by standing ready, willing, and able to generate, outputs that replicate SOCAN Works and that may be accessed, on demand, both by those users and by other members of the public. Outputs that are identical or substantially similar to SOCAN Works, including the Listed Outputs, are referred to as "Infringing Outputs".

9. By making those SOCAN Works available in that way, and by streaming them to users in Canada, Suno has infringed SOCAN's Performing Rights. Suno's belated introduction of so-called "guardrails"—a clear acknowledgement that it understands its conduct to be unlawful—has done little to curb its infringing behaviour.

10. Suno is now valued at $5.4 billion USD. It has over 2,000,000 paid users, collects over $300 million USD in annual recurring revenue, and generates an estimated 7,000,000 musical outputs per day.

11. All rightsholders, including music creators and music publishers, have the right to be compensated when generative AI companies like Suno train models on their works. They also have the right to be compensated when AI companies generate and make available outputs that replicate and substitute for their works and when those outputs are streamed to users. In all cases, consent for any use of copyright-protected works must be obtained in advance.

12. From the outset, Suno has intentionally built its business on the backs of music creators, music publishers, and other rightsholders. It has known at all material times that SOCAN Works have substantial value and that a licence is required to use them. Despite that knowledge, Suno has deliberately exploited the Listed Works and other SOCAN Works for commercial purposes, and continues to do so, without a licence from SOCAN. This litigation is a natural consequence of that calculated course of action.

II. The Parties

(a) SOCAN

13. SOCAN is a not-for-profit corporation incorporated under the laws of Canada, with its registered head office located at 41 Valleybrook Drive, Toronto, Ontario.

14. SOCAN is a collective society as defined in section 2 of the *Copyright Act*. It carries on the business of granting licences and collecting royalties for the public performance and reproduction of SOCAN Works in Canada.

(b) Suno

15. Suno is a private, for-profit corporation organized and existing under the laws of the State of Delaware, with its principal place of business at 17 Dunster Street in Cambridge, Massachusetts. Suno developed the Suno Model and the Suno Platform that it powers and now operates them in Canada and around the world.

III. The SOCAN Works and the Listed Works

16. The SOCAN Works comprise virtually all copyright-protected musical works in current use in Canada. They include some of the most famous and successful songs ever written by Canadians.

17. Every SOCAN Work, including every Listed Work, is an original work in which copyright subsists. SOCAN owns Performing Rights in the Listed Works pursuant to written assignments signed by the SOCAN members who are authors of those works. Those authors are identified in Appendix A. Each of those authors is either a living person or died after December 31, 1971, such that copyright in their Listed Works has not expired. Each was also a citizen, subject, or resident of a treaty country, as that term is defined in the *Copyright Act*, when their Listed Works were created, and each Listed Work was first published in a treaty country.

18. SOCAN owns or has been granted an interest in writing in Performing Rights in every SOCAN Work referred to in this pleading. Its consent is required for any act that engages Performing Rights in any SOCAN Work.

IV. The Suno Platform

(a) Development and Launch of the Suno Platform

19. The Suno Platform, launched in 2023, is an AI-based music generation and streaming platform available to the public in Canada and around the world. It is available in a web-based format, at <www.suno.com>, and through a mobile application offered for use with most smartphones and tablets, including Apple and Google Android devices. In June 2026, Suno announced plans to launch an application programming interface (API) that will enable third-party developers to offer their own AI music-generation products powered by the Suno Model.

20. Suno has trained the Suno Model on virtually all music files of reasonable quality that are accessible on the Internet—at least hundreds of millions of audio files and corresponding textual metadata—through the mass ingestion, copying, and processing of those files, all without permission from rightsholders. It has also invited users to upload additional digital music files to the Suno Platform and has trained the Suno Model on those files as well. As a result, Suno can generate outputs that are identical or substantially similar to those works, including SOCAN Works, and imitate genuine musical works created by human authors. Its ability to do so is enhanced by the Suno Model's having memorized many of the musical works on which it is trained.

21. In other words, by entering a prompt into the Suno Platform, a user is given access to SOCAN Works memorized by the Suno Model, or otherwise used in its training, in the form of identical or substantially similar Suno outputs. Those outputs can then be streamed on demand, both by that user and potentially by other members of the public. In that way, Suno has made, and continues to make, SOCAN Works available to the public, in whole or substantial part, through the Suno Platform.

22. Since its initial launch, Suno has continuously updated both the Suno Platform and the Suno Model that powers it. As of ~~August 2026~~ September 8, 2026, the current version of the Suno Model ~~is~~ was identified on the Suno Platform as version 5.5. Prior versions of the Suno Model, including those identified as versions 2, 3, 3.5, 4, 4.5-all, 4.5, 4.5+, and 5, ~~are also~~ were available for use on the Suno Platform at that time.

23. On September 9, 2026, Suno released versions 6, 6-wild, and 6-mini of the Suno Model (collectively, the "v6 Suno Model"). On the same day, Suno purported to retire all previous versions of the Suno Model. Nevertheless, most of the Listed Outputs remain publicly available for streaming on the Suno Platform as of November 18, 2026.

24. Appendix A identifies additional Listed Outputs, generated using the v6 Suno Model, that are identical or substantially similar to Listed Works. Suno has not obtained licences from SOCAN in relation to those Listed Works.

25. For clarity, this action applies to all past and current versions of the Suno Model, including versions 2, 3, 3.5, 4, 4.5-all, 4.5, 4.5+, 5, 6, 6-wild, and 6-mini, and any other version released through the date of trial.

(b) Generation of Suno Outputs

26. Suno generates musical outputs within seconds of receiving a prompt entered by a user on the Suno Platform.

27. Suno invites users to take various steps to cause it to generate an output. Those steps may include

a. submitting text-based prompts, which may include complete or partial lyrics, a written description of the desired style and other attributes for the output, or both;

b. selecting and adjusting certain preset parameters, including vocal gender, style influence, and "weirdness"; and

c. uploading a pre-existing digital audio file, or using the Suno Platform to record new audio content, for use as a source for the output.

28. Within seconds of those steps being completed, Suno generates two outputs through the Suno Platform. Suno then invites the user to stream, download, and cause those outputs to be shared both on and off the Suno Platform. It also invites the user to adjust elements of the outputs, including their lyrics, tempo, mood, and genre.

29. Suno also invites a user to use the "Remix" or "Remix/Edit" function to cause Suno to generate additional outputs that are based on existing outputs or other digital audio files and replicate the musical works embodied in them.

30. In general, a user must create a user account to cause Suno to generate outputs. However, anyone can access and listen to streams of Suno outputs on the Suno Platform on demand, even without a user account.

(c) Use of Suno Outputs

31. Suno makes outputs available for on-demand streaming, and streams them on demand, in several ways.

a. Once a user causes Suno to generate an output, Suno provides that user with on-demand access to that output.

b. Suno encourages the user to cause it to "publish" the output on the Suno Platform. Once published, the output can be located and accessed for on-demand streaming by the public.

c. Suno also encourages users with paid accounts to upload outputs to third-party streaming services, such as Spotify, Apple Music, and YouTube, for commercial exploitation on those services.

32. Suno promotes the outputs that it makes available for on-demand streaming. For example, the Suno Platform prominently displays playlists curated both by Suno (e.g., "staff picks") and by users, recommends outputs to users based on their learned preferences or other factors, and invites users to "like" or "dislike" and comment on outputs, build and share their own playlists of outputs, and "follow" other users.

33. When a Suno user selects a Suno output to stream, the Suno Platform automatically populates the user's listening queue with algorithmically-recommended Suno outputs. Once the output selected by the user finishes playing, the Suno Platform streams those other outputs to the user automatically, in a continuous sequence, with no further action required by the user.

V. Suno's Infringing Activities

34. Suno is shockingly efficient at imitating human-created music and generating infringing content. It does so at blazing speed and on a massive scale. Unlike human authors, who devote skill, judgment, time, and creativity to writing original musical works, Suno uses the Suno Model to replicate those works within seconds and with little or no human input.

35. That capacity is not incidental to the Suno Platform; it is central to Suno's commercial offering. Suno generates, modifies, publishes, streams, remixes, and commercially exploits musical outputs that replicate the original expression embodied in existing music, and both enables and encourages its users to participate in those infringing activities using means that Suno controls. The result is a system that generates infringing copies of musical works at a scale, speed, and ease that no human music creator could ever approach, then makes them available for streaming to the public on demand. By doing so, Suno diverts attention, listening time, and revenue away from music creators, music publishers, and other rightsholders while it profits from the infringement of their rights.

(a) The Listed Outputs

36. The Listed Outputs, and the Listed Works they infringe, cut across multiple genres, styles, and languages. The authors of the Listed Works represent a wide variety of cultures and communities in Canada and range from up-and-coming talents to some of the country's most internationally renowned songwriters and composers.

37. Qualitatively and holistically, each Listed Output is identical or substantially similar to the corresponding Listed Work.

38. For illustrative purposes, the musical transcriptions set out in the following paragraphs show some of the specific similarities between certain Listed Outputs and Listed Works. Each transcription compares the lyrics, melody, and harmony for parts of a Listed Work (top row) and the corresponding Listed Output (bottom row). Exact

similarities in melody (including both pitch and rhythm) and harmony are shown in red notation,[1] while other relevant similarities are shown in blue notation and red boxes.[2]

39. For example, in response to a prompt consisting of only the lyrics to the Listed Work entitled “Both Sides Now”—written, performed, and originally recorded by Joni Mitchell, the iconic Canadian singer-songwriter—Suno generated a Listed Output that is virtually identical, including in its melody, harmony, and lyrics, as can be seen in the following transcription:

[1] Where a Listed Output is in a different key from the corresponding Listed Work, it has been transposed for the purpose of comparison.

[2] Blue notation is used for corresponding notes with any of the following characteristics: (i) identical pitch and identical metric placement but different rhythmic duration; (ii) identical pitch and metric placement within half a beat; or (iii) identical rhythmic duration and identical metric placement, but different pitch. Red boxes are used for corresponding lyrics set to identical or near-identical pitch sequences that have slightly different rhythmical alignment.

"Both Sides Now"



40. Another Listed Output, entitled "life is a highway", is strikingly similar to the Listed Work entitled "Life is a Highway", written, performed, and originally recorded by the renowned Canadian singer-songwriter Tom Cochrane and later covered by the acclaimed country band Rascal Flatts. This can be seen, for example, in the following transcription of the chorus of the song as covered by Rascal Flatts:

"Life is a Highway"



41. There are similar examples of Listed Outputs that are identical or substantially similar to Listed Works written in other languages, including French and Punjabi. For example, the Listed Output entitled "Femme Like U" is virtually identical to the Listed Work with the same title, written by SOCAN members Cyril Kamar and Louis Joachim Côté, and performed and recorded by Mr. Kamar, a multiple SOCAN Award-winning francophone hip-hop artist professionally known as K.Maro:

"Femme Like U"



42. Suno has also generated Listed Outputs in which the original lyrics of the Listed Work are communicated in different languages. For example, the Listed Output entitled "Sk8er Boi (K-pop remix) (Avril Lavigne cover)" is virtually identical to the Listed Work entitled "Sk8er Boi", co-written, performed, and recorded by the international Canadian superstar Avril Lavigne, except with some of the original lyrics replaced by their Korean equivalents:[3]

[3] Phoneticized Korean lyrics are shown in italic text.

"Sk8er Boi"



43. Other Listed Outputs consist of Listed Works presented in musical styles different from their original recordings or, in some cases, the lyrics of a Listed Work set to a different melody. For example, the Listed Work entitled "Big Yellow Taxi" is a famous folk-rock song also written, performed, and originally recorded by Joni Mitchell. Some Listed Outputs replicate the lyrics, melody, and rhythm of that song, but in dramatically different styles including pop-rap and 1990s grunge rock. In each case, the Listed Output is substantially similar to the corresponding Listed Work.

44. Still other Listed Outputs have been remixed to generate additional Listed Outputs. For example, the Listed Output entitled "PASSING OUT IN AMERICA

(ALEXISONFIRE)" is a Suno-generated "remix" of another Listed Output entitled "PASSING OUT IN AMERICA REMAKE (ALEXISONFIRE)". Each of those Listed Outputs, which Suno generated in response to prompts from different users, is substantially similar to the Listed Work entitled "Passing of America", whose authors include SOCAN members Chris Hughes, Peter Krpan, and Kenny Bridges, originally performed and recorded by the Canadian indie-rock band Moneen, and covered as "Passing Out in America" by the award-winning multi-platinum Canadian band Alexisonfire. This is an example of how each Infringing Output can lead to many more outputs that are identical or substantially similar to SOCAN Works.

45. The striking similarities between the Listed Works and the Listed Outputs are immediately recognizable to a layperson in the intended audience for the works at issue. In many cases, listeners have posted comments on the Suno Platform remarking—and even offering congratulations—on the fact that a Listed Output is virtually identical to the corresponding Listed Work. In addition, the titles of the Listed Outputs on the Suno Platform explicitly identify many of them as "covers", "remakes", or "remixes" of Listed Works and/or the performer of the Listed Works.

46. Certain Listed Outputs are also posted on third-party streaming services, such as YouTube, for commercial gain.

(b) Suno's Unlawful Communication of the Listed Works

47. Suno has infringed SOCAN's Performing Rights in the Listed Works by engaging in the following acts without SOCAN's consent:

a. Making the Listed Works available for on-demand access by offering to generate, or standing ready, willing and able to generate, and generating, outputs that are identical or substantially similar to those

Listed Works, including the Listed Outputs, and that can then be listened to by the user;

b. Making the Listed Works, in the form of the Listed Outputs, available to the public for on-demand streaming, including through embedded links, and communicating them to the public by telecommunication through the Suno Platform, or, in the alternative, authorizing users to do so;

c. Authorizing users to make the Listed Works, in the form of the Listed Outputs, available to the public for on-demand streaming on third-party streaming services or websites; and

d. Making available, or authorizing users to make available, outputs generated by applying, or inviting users to apply, the "Remix" or "Remix/Edit" function to an existing Listed Output.

48. If Suno does not engage directly in the conduct pleaded in subparagraphs ~~44.b~~47.b and ~~44.d~~47.d, it explicitly or implicitly authorizes its users to engage in those infringing activities. Suno controls the means by which those activities are performed, including by operating all aspects of the Suno Platform, generating the Infringing Outputs, and having trained the Suno Model on copyright-protected musical works in the first place. What is more, Suno encourages, or at least exhibits indifference to, the infringing behaviour of its users, purporting to hide behind its terms of use rather than taking proactive steps to operate in a lawful manner.

49. Suno's recent introduction of so-called "guardrails" that apply to the generation of new outputs—years after its launch—confirms both that it is aware of the infringing nature of its business model and that it could have taken steps much earlier to seek

to prevent infringement. In any event, Suno knows that those guardrails are woefully inadequate. Further, it takes no steps to prevent, or even deter, the dissemination of Infringing Outputs that it has already generated—even where it knows, or ought to know, they are infringing.

50. At all material times, Suno knew, or ought to have known, that

a. copyright subsists in the Listed Works;

b. SOCAN owns Performing Rights in the Listed Works;

c. its activities as set out in this statement of claim engage those Performing Rights and therefore require SOCAN's consent; and

d. without SOCAN's consent, those activities would infringe SOCAN's Performing Rights in the Listed Works.

51. Suno continues to engage in these unlawful activities.

(c) Additional Infringements

52. The Listed Outputs are not isolated anomalies or the result of accidental similarities. They are the foreseeable and intended consequence of Suno's core business model, which involves training the Suno Model on copyright-protected works, causing or allowing it to memorize some or all of those works, and generating, making available, remixing, promoting, and commercially exploiting musical outputs at scale through the Suno Platform. By generating and disseminating Infringing Outputs on demand, Suno has established the Suno Platform as a substitute source of on-demand streams of SOCAN Works, without consent from or remuneration to the

songwriters, composers, and music publishers whose work made the Suno outputs, and Suno's business, possible.

53. Indeed, the Listed Outputs represent only a small fraction of all the Infringing Outputs that Suno has generated and made available to the public for on-demand access. Similarly, the Listed Works represent only a small fraction of the SOCAN Works in which Suno has infringed SOCAN's Performing Rights.

54. It is impossible for SOCAN to know the full scope of Suno's infringing activities, or to identify all the SOCAN Works that it has infringed, at this time. Suno shares a vast number of Suno outputs with the general public—far more than can possibly be identified using ordinary investigative means—and it is impossible for SOCAN to access the many other outputs that Suno makes available only to individual users. However, Suno knows the full particulars of its infringement, including the SOCAN Works that have made available to the public in the ways described above, as well as the additional Infringing Outputs that Suno has shared with individual users and with the general public.

55. Suno's additional infringements of SOCAN's Performing Rights, in both the Listed Works and other SOCAN Works, will be revealed through this litigation. Particulars of those infringements, the additional SOCAN Works infringed, and the nature and source of SOCAN's rights in those SOCAN Works will be provided as the additional infringing activities are identified. SOCAN claims the relief pleaded in this statement of claim in relation to all those infringements of SOCAN's Performing Rights.

VI. SOCAN is Entitled to the Requested Relief

(a) Damages and Disgorgement of Profits

56. The SOCAN Works are extremely valuable to SOCAN and its members. SOCAN's writer members expend immeasurable time, resources, and creativity in developing their craft, creating music, and building their careers. Its music publisher members develop, promote, and invest in those music creators and their musical works, helping ensure that new music is created and finds its way to the public. And SOCAN itself, as a copyright collective society, invests millions of dollars each year to ensure that its members are able to earn fair compensation for the use of their musical works.

57. Suno has helped itself to a massive number of SOCAN Works without consent. It has used them in ways that enrich Suno at the expense of SOCAN and the rightsholders it represents. It has also forced SOCAN's members, and songwriters, composers, and music publishers around the world, into the difficult position of having to compete in the marketplace with AI-generated outputs improperly derived from their work, even as it has diluted and devalued the market for human-created music and the royalties paid for it.

58. As a result of all this, SOCAN has suffered significant damages. Suno is liable to pay those damages, as well as such part of the profits that Suno has made from its infringing conduct, to SOCAN pursuant to section 35(1) of the *Copyright Act*.

59. In the alternative, SOCAN may elect to claim statutory damages, pursuant to paragraph 38.1(1)(a) of the *Copyright Act*, to a maximum of $20,000 for each of the Listed Works and for each additional SOCAN Work in which Suno has infringed SOCAN's Performing Rights.

60. Suno's conduct warrants an award of statutory damages in the maximum amount available under the *Copyright Act*, should SOCAN elect that remedy, including in view of the factors in subsection 38.1(5) of the *Copyright Act*. Suno has acted in bad faith by helping itself to a massive number of SOCAN Works, without first seeking or obtaining a licence to do so, then using them, and the Suno Model trained on them, to build a commercial enterprise that is now worth billions of dollars. It has done that while knowing all along that it was engaging in rampant copyright infringement on a massive scale and making no prior attempt to compensate the music creators and music publishers whose valuable work is essential to its success.

61. At a time when generative AI poses an ever-increasing threat to the careers and livelihoods of human authors, there is a pressing need to deter other AI companies from infringing SOCAN's Performing Rights in this brazen manner.

(b) Punitive and Exemplary Damages

62. Suno's knowing, high-handed, wilful, and malicious disregard for SOCAN's Performing Rights also warrants an award of punitive and exemplary damages. This Court ought to denounce Suno's conduct, which represents a marked departure from standards of decent commercial behaviour. There is a strong need to deter Suno, and other AI companies, from misappropriating and devaluing copyright-protected works and other subject matter in the development, launch, and operation of AI technologies and services.

(c) Injunctive Relief

63. SOCAN is entitled to a permanent injunction restraining Suno, and all parties directly or indirectly controlled by Suno or acting on its behalf, from infringing SOCAN's

Performing Rights in the Listed Works and any other SOCAN Works that may be identified through this litigation.

64. Further, unless a wide injunction is granted under section 39.1 of the *Copyright Act*, Suno is highly likely to infringe SOCAN's Performing Rights in other SOCAN Works. That includes musical works that do not yet exist, that have not yet been released in Canada, or in which SOCAN has not yet acquired or been granted an interest in writing in Performing Rights. By Suno's own admission, it has trained the Suno Model on essentially all music available on the Internet. It has the proven ability to generate and disseminate outputs that are identical or substantially similar to that music, and will surely continue to do so in furtherance of its business objectives unless enjoined by this Court.

65. SOCAN pleads and relies on the *Copyright Act*, including sections 2.4, 3, 5, 13, 24, 27, 34, 34.1, 35, 38.1(1)(a), 39.1, and 41.23(2)(c).

SOCAN proposes that this action be tried in Toronto.



September 2, 2026
Amended November 18, 2026

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APPENDIX "A" TO STATEMENT OF CLAIM

Title of Listed Work	SOCAN Author(s)	Title of Infringing Output	Link to Infringing Output
8ths	Joel Thomas Zimmerman	deadmau5 — 8ths (coVER. 04)	https://suno.com/song/e55bcf63-5ba3-4887-aead-2b75e7d33599
A New Day Has Come	Aldo Caporuscio, Stephan Moccio	A New Day Has Come - Céline Dion -на русском	https://suno.com/song/ff8a9183-1a00-492a-92b3-8c87c29fe1c2
A New Day Has Come	Aldo Caporuscio, Stephan Moccio	A New Day Has Come - Céline Dion -на эстонском	https://suno.com/song/71321d2c-5f6b-46d1-88d5-36f207376e3f
Adia	Sarah Ann Mclachlan, Pierre Marchand	Aidia - Sarah McLachlan	https://suno.com/song/1313b6ff-9765-440f-bc57-05b8f7d6a347
All My Charms	Stuart Chatwood, David John Cyrenne, Timothy Robert Lane, Jeffrey Scott Martin	all my charms	https://suno.com/song/f7c37313-0255-4a1a-8d52-4c630d8aeb36
American Woman	Randolph Charles Bachman, Burton Cummings, Michael James Kale, Garry Dennis Peterson	American woman	https://suno.com/song/532c6107-b98f-4840-b7bd-cbcc28d8c2b6
American Woman	Randolph Charles Bachman, Burton Cummings, Michael James Kale, Garry Dennis Peterson	American woman feet.Suno AI	https://suno.com/song/372eaf7a-adea-4451-b0e2-446951ad1661
Angel	Sarah Ann Mclachlan	Sarah McLachlan - angel (Cover)	https://suno.com/song/7fd30106-e2bc-4bd9-93a0-133ef5e5918e
Anti-Manifesto	Christopher John Hannah, Jordan Samolesky	Anti-Manifesto	https://suno.com/song/045f52ac-5c36-414b-b532-ab2ff9d74a6e

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Bad Timing	James G Cuddy, J Gregory Keelor	Mauvais Timing - Blue Rodeo - FR - Cover 003	https://suno.com/song/da31f65e-2b02-45f4-afb9-918a833b6794
Bananaphone	Raffi Cavoukian, Michael Ernest Creber	Banana phone (Remastered)	https://suno.com/song/e002e2b4-66f7-4596-9354-e997dd123a74
Barefoot Blue Jean Night	Terrance Sawchuk	Barefoot Blue Jean night (Root-Beer version)	https://suno.com/song/a81ae526-5198-413c-b132-5a89fdc99fb3
Beautiful Things	Evan Robert Eliiot Blair	Benson Boone_ Beautiful Things -на русском	https://suno.com/song/7bd6c1c6-9637-4f9a-8a20-6f39be883284
Beautiful Things	Evan Robert Eliiot Blair	Beautiful Things	https://suno.com/song/0b1bed7c-86be-47c0-b696-a7a6de059f0d
Big Yellow Taxi	Joni Mitchell	Paved Paradise Take 2 (Joni Mitchell Homage)	https://suno.com/song/1cdfb5d0-f39b-4fa1-ab8d-df011726f3e1
Big Yellow Taxi	Joni Mitchell	Big Yellow Taxi (Remastered)	https://suno.com/song/7462cead-c00f-42f5-95a0-7ae2d586491f
Black Velvet	David Michael Tyson, Christopher William Ward	Black Velvet (Alannah Myles Cover)	https://suno.com/song/9912a595-d866-4a74-b78a-c1472f805fb5

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Blame Brett	Elizabeth Lowell Boland, Gustavo Coriandoli, Leandra Teresa Marr Earl, Eliza Mary Clara Enman Mcdaniel, Jordan Leigh Miller, Kylie Anne Miller	Blame my Ex	https://suno.com/song/8af5ae0c-e0f1-4011-b969-66dea4c97ce6
Blinding Lights	Ahmad Balshe, Matthew Jason Quenneville, Abel Tesfaye	Blinding Lights (Cover)	https://suno.com/song/5975a317-514e-4da0-82c6-cc94de6b0705
Blinding Lights	Ahmad Balshe, Matthew Jason Quenneville, Abel Tesfaye	blinding lights	https://suno.com/song/7ffe85d0-6e76-4ad3-8d23-7828abeca47d
Blue	Max Zhikun Zhang	yung kai - blue (Lyrics) (Pitch 0.00 - Tempo 120) (Remastered)	https://suno.com/song/a89d3faf-e202-46da-9ea3-2db530e6de98
Bobcaygeon	Robert Edwin Baker, Gordon Edgar Downie, John Philip Fay, Paul Joseph Langlois, Robert Gordon Sinclair	Bobcaygeon	https://suno.com/song/09cff952-aa14-485d-bdd9-f9a0187119cf
Bobépine	Michel Latraverse	Bobépine - Plume Latraverse	https://suno.com/song/f2c04824-e229-40cb-829d-cf28168c083a
Bonjour la police	Andre Jacques Ducharme, Bruno E Landry, Guy A Lepage, Daniel Marsolais, Yves Pelletier, Jocelyn Therrien	Bonjour La Police (RAP)	https://suno.com/song/51b74af9-197a-46c0-a930-4f4d3459e4d9
Born To Be Wild	Mars Bonfire	Born To Be Wild (Cover)	https://suno.com/song/9400f8ce-7512-49a1-90ab-72a22886152a

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Both Sides Now	Joni Mitchell	Both Sides Now	https://suno.com/song/b1ea3538-b8b5-4bc9-ae0e-e7f5b8c07b6a
Both Sides Now	Joni Mitchell	Both Sides Now	https://suno.com/song/88627e20-601b-4afd-aced-9d6446fe11d4
Brackish	Fallon Bowman, Mercedes Lander, Morgan Lee Lander	Brackish	https://suno.com/song/4ecb5a36-3205-4179-9d74-ca37b4fde018
Call Me Maybe	Tavish Joseph Crowe, Carly Rae Jepsen, Joshua Keeler Ramsay	CALL ME MAYBE (Boy Group ver.) (Carly Rae Jepsen cover)	https://suno.com/song/5b037122-6d6d-4e15-83ee-2b3ff4b88920
Civil Twilight	Stephen Allan Carroll, Greg Scott Smith, Jason Tait, John K Samson	Civil Twilight by Moi	https://suno.com/song/ea7cba1e-0826-4d00-a012-50d96011fe9a
Closer	Shaun Charles Frank	The Chainsmokers - Closer (Lyrics) ft. Halsey	https://suno.com/song/79a83787-45cf-452b-9608-2f16813fdb62
Comme des enfants	Beatrice Mireille Martin	Comme des enfants	https://suno.com/song/26fd826a-a2fa-4e76-af16-ba6607c208c9
Congratulations	Adam King Feeney	Post Malone, Quavo - Congratulations (Metal Cover AI)	https://suno.com/song/60dac204-0dfc-4a84-b9a4-66f8e3dd0915
Dai Dai	Saul Alexander Castillo Vasquez, Ahmed Saghir, Vanesa Castillo Vasquez	Dai Dai (Shakira & Burna Boy Cover-Remix) - SAN1project & SUNO	https://suno.com/song/8e6417c9-61b9-47c0-aab0-4fdd5c431778

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Dai Dai	Saul Alexander Castillo Vasquez, Ahmed Saghir, Vanesa Castillo Vasquez	Dai Dai - Shakira, Burna Boy (WK 2026 Anthem))	https://suno.com/song/003ec772-0ae9-433a-afaf-730b627d3d77
Dancing in the Sky	Danielle Marie Nelson, Elizabeth Anne Nelson, Jason Traub	Dancing in the sky	https://suno.com/song/a8d1f5c8-a51b-487c-a788-867d7276432d
Dangerous	Cristian Marcelo Bahamonde, Jason D Harrow	Kardinal Offishall - Dangerous	https://suno.com/song/96bfd2d5-83a6-42a2-aae5-f54eaedc120d
Death Bed (Coffee for Your Head)	Isaiah Faber	Death bed (Cover)	https://suno.com/song/fedd912d-b048-4888-87b1-896e10dc5410
Democracy	Leonard Cohen	Democracy (Leonard Cohen cover, fair use) - alt. music	https://suno.com/song/c837554c-48b7-4350-85d1-fd63b0b254b1
Drinking in L.A.	Haig Vartzbedian, James Di Salvio	Bran Van 3000 - Drinking In L.A (Glow Groove Mix 2)	https://suno.com/song/e178b2e3-6b93-4998-a7ef-66ac397f6d7b
Echo	Alexander Stewart	Alexander Stewart - Echo (Cover)	https://suno.com/song/ed39ce7a-0106-4bea-9862-d221446fa9fd
Echo Beach	Mark Thomas Gane	Echo Beach (Martha version)	https://suno.com/song/e558cf96-fd3a-4ccd-a3ae-507c459ab551
En Berne	Jean Francois Pauze	En Berne cover des cowboys fringants	https://suno.com/song/39adf352-eb9a-4c0a-b8de-dc50ecab5c28
Fabienk	Klek De Poitrine, Khn De Poitrine	Angine de Poitrine - Fabienk (Jazzy Upgrade)	https://suno.com/song/dcf84b88-241b-48bf-8e45-f2f9528fd2a0

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Feel Good	Charlotte Cardin, Marco Royal Nicodemo, Jason Brando O'farrell Ciciola, Mathieu Senechal, Phillipe Stebbings	Charlotte Cardin Feel Good (Remastered)	https://suno.com/song/9b7855bd-3a5f-4fec-9648-1a4a4e25ca1c
Femme Like U	Cyril Kamar, Louis Joachim Cote	Femme Like U (K-Maro Cover-Remix) - SAN1project & SUNO	https://suno.com/song/e7248d1a-9978-45ea-817b-d5b01dae2a6f
Free	Jenna Lauren Antonia Elyse Hamilton Andrews	Free (KPop Demon Hunters) Remix	https://suno.com/song/e88901af-b616-4075-8ae8-2c8768a9232a
Hallelujah	Leonard Cohen	Hallelujah	https://suno.com/song/38e5df2f-3fb7-4752-9492-54051acc8e37
Hallelujah	Leonard Cohen	Hallelujah (Acapella Cover)	https://suno.com/song/a8de4eae-71c8-4556-a816-4728f2b64640
He Wasn’t	Avril Ramona Lavigne, Chantal Kreviazuk	He Wasn’t (Avril Lavigne Cover)- Regina George	https://suno.com/song/6bf9ef3f-d3a8-4859-b5a2-5c35be79ba53
Heaven	Bryan Adams, James Douglas Vallance	Bryan Adams - Heaven -на русском	https://suno.com/song/87283d57-9ff4-4ea8-b717-69e83029aa1e
Hélène	Stephane Louis Lessard, Roch Voisine	Roch Voisine - Hélène	https://suno.com/song/f99c2b6d-97a9-4d79-ad08-97c55378940d
Hello Time Bomb	David Robert Madison Genn, Matthew Fredrick Robert Good	No Me - Hello Time Bomb! (Cover)	https://suno.com/song/946ba2b9-d7f6-4d24-9228-522c732c087e
Hit Me With Your Best Shot	Edward Sydney Schwartz	Hit me with your best shot (Pat Benitar cover)	https://suno.com/song/e1ba444e-7bde-41c4-be81-464148345cb3

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Horse Soldier, Horse Soldier	Corby Clark Marinus Lund	Horse Warrior [Horse Soldier Horse Soldier- Corb Lund, Remake]	https://suno.com/song/596f364f-0e82-4861-8f43-b7e0efa672de
Houdini	Tobias Macdonald Jesso	Houdini (Dua Lipa Cover-Remix) - San1Project & SUNO	https://suno.com/song/9415643d-0c45-4419-bd84-ed5408f1c793
How You Remind Me	Chad Robert Kroeger, Michael Douglas Henry Kroeger, Ryan Anthony Peake, Ryan Vikedal	Nickelback - How you remind me (Akira Cover) (Remastered)	https://suno.com/song/f0d9699c-44f9-4d64-b5ec-034493853c1f
I Ain't Sayin'	Emily Reid, Travis Peter Wood	I Ain't Sayin' (Cover)	https://suno.com/song/a69ddc76-d053-4cc4-bff8-0c5d0fd18698
I Hate Everything About You	Gavin Brown, Adam Gontier, Neil Sanderson, Brad Walst	Three Days Grace - I Hate Everything About You (Cover)	https://suno.com/song/9495fb40-2d19-4375-8ea6-a4dd917a7ddd
I Really Like You	Carly Rae Jepsen	I REALLY LIKE YOU (K-Pop remix) (Carly Rae Jepsen cover)	https://suno.com/song/4307bfe1-19d4-4556-8418-7608dd855e27
I'm Just A Kid	Arnold David Lanni, Sebastien Lefebvre, Jean Francois Stinco	Simple Plan - I'm Just a Kid на русском	https://suno.com/song/cb1fdab8-8a59-487f-b28f-819925747afb
If I Had $1,000,000	Steven Jay Page, Lloyd Edward Elwyn Robertson	If I Had $1,000,000 synthwave	https://suno.com/song/e6b65e7b-15a0-488b-a529-1ae028277a9a

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If the World Was Ending	Jonathan Percy Starker Saxe	If the world was ending	https://suno.com/song/e29fc705-ddee-4ae2-82e8-0eff6675b403
If You Could Read My Mind	Gordon Lightfoot	If You Could Read My Mind	https://suno.com/song/c400f029-0051-4a34-aa60-d1ca12d8b9bd
In Too Deep	Deryck Jason Whibley	sum 41	https://suno.com/song/d2284b5b-35d4-41e9-97cb-f5bfe3474c60
Informer	Darrin O'brien	° INFORMER ° (Afro)	https://suno.com/song/a88b8ff7-dc55-4830-b98a-5944512a2770
It’s ok I’m ok	Tate Mcrae	Tate McRae - It's ok I'm ok	https://suno.com/song/cbe60fa5-aecd-4fb0-a1e9-f5e4134024a6
Jackie Chan	Julian Dzeko, Raynford Avery Humphrey, Luis Torres Raposo	Tiësto & Dzeko - Jackie Chan (Melody Groove Mix 1)	https://suno.com/song/7c28038e-3601-4a24-ac34-dc90a1c03e71
J'aime ta grand-mère	Pierre Luc Boisvert, Charles Dubreuil, Alexandre Michel Parr, Simon Farrell Proulx	J'aime ta grand mère	https://suno.com/song/af1021b3-0ceb-4298-b1a4-370a319dd372
Japanese Denim	Matthew Raymond Burnett, Ian Kenneth William Culley, Jordan Dc Evans, Chester Anton Mathias Hansen, Ashton Dumar Norwill Simmonds, Alexander William Sowinski, Matthew Adam Tavares, Leland Dean Whitty	Japanese Denim	https://suno.com/song/d8810c70-8cfd-428b-9098-88430e33a414

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Je danse dans ma tête	Romano Musumarra, Luc Plamondon	Je danse dans ma tête de Céline Dion, la madame qui chante mais qui est malade	https://suno.com/song/b51e9af7-a319-4fa6-b89e-603e4115617d
Je t'aime	Lara Sophie Katy Crokaert, Eric Vleminckx	Lara Fabian - Je t'aime	https://suno.com/song/111c501d-9dbc-461d-94bf-d8d419d4910c
King Shit	Shubhneet Singh	KING SHIT | SHUBH - DEEP HOUSE 3 (REMIX)	https://suno.com/song/d62be49d-a416-47b0-814c-dc90d011157d
La complainte du phoque en Alaska	Michel F Rivard	La complainte du phoque en Alaska	https://suno.com/song/b77a717e-e447-4a29-b3ee-aff2ce14bc94
La danse à St-Dilon	Gilles Vigneault	La danse à St-Dilon (J-POP)	https://suno.com/song/8becbc2b-d7f8-4904-84bc-5fa3dd5d9def
Lalala	Alexander Leon Gumuchian	Y2K, bbno$ - Lalala (Metal Cover AI)	https://suno.com/song/95cb5050-1d0d-4a19-b239-acee5dc2db26
L'Amérique pleure	Jerome Dupras, Marie-Annick Lepine, Jean Francois Pauze	Les Cowboys Fringants - L'Amérique Pleure (Metalcore)	https://suno.com/song/e216b878-ae47-4991-bc11-a01fbff79fbe
Levitating	Stephen Noel Kozmeniuk	Levitating EDM #criminal re-release	https://suno.com/song/e7ef3419-25d7-416e-81b3-ed88460a2144
Life is a Highway	Thomas William Cochrane	life is a highway	https://suno.com/song/f3ad8293-f662-4142-b226-671762b06191

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Limbo	Ryan Chassels	Freddie Dredd-Limbo (Trap Metal Vers)	https://suno.com/song/00576013-60dc-4852-940a-db2077f6a58a
Lost Together	James G Cuddy, J Gregory Keelor	Lost Together Cover Blue Rodeo	https://suno.com/song/abaf0781-e8cd-495c-8d70-dc8482064986
Low	Joshua Keeler Ramsay, Matthew Ian Webb, Michael John Edward Ayley, Ian Randle Clifford Casselman	Low (Marianas Trench Cover)	https://suno.com/song/5469e53d-6151-49f2-8c9b-587871e9e407
Maneater	Nelly Kim Furtado	Maneater	https://suno.com/song/eba34fc7-c03e-4c24-b551-f3b3cd92c6f2
Maybe Tomorrow	Terrence Teakle Bush, John Robert Crossen	The Littlest Hobo	https://suno.com/song/cc713305-e93b-48d4-982e-ef765e6259b3
Medusa	Cameron Donald Whitcomb	Cameron Whitcomb - Medusa (Joey Berglund Remix).mp3 (Remix)	https://suno.com/song/afe21a61-2371-4f95-ae72-6a0485b06a64
Mistletoe	Nasri Tony Atweh, Adam David Messinger	KPOP - mistletoe	https://suno.com/song/b1537013-732d-4ec5-8089-e10cd8a80ce5
Mmm Mmm Mmm Mmm	Bradley Kenneth Roberts	Mmm Mmm Mmm Mmm by Crash Test Dummies - cover	https://suno.com/song/cc95f05e-e72c-45a8-8b8f-60daf95263db
My Kind of Woman	Macbriare Samuel Demarco	My Kind of Woman - Mac Demarco	https://suno.com/song/d2d84d7c-88dc-488d-9d2b-244bf05ef690

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Naveed	Christopher John Eacrett, Arnold David Lanni, Michael Maida, Mike A Turner	Naveed (OLP song Cover by Hide) (Remastered)	https://suno.com/song/03ed74a5-b35f-4d57-a47e-37c0cc612534
New Orleans Is Sinking	Robert Edwin Baker, Gordon Edgar Downie, John Philip Fay, Paul Joseph Langlois, Robert Gordon Sinclair	New Orleans is sinking (cover)	https://suno.com/song/33751162-43b0-4372-b721-f11a8cfb68ad
Nouveau	Jean Christophe Di Mambro, Nicolas Ranchoux	Les Anticipateurs - NOUVEAU Prod	https://suno.com/song/2b31b81f-f38d-4197-9c1d-142cc54a24a8
Nova	Tayeb Zitouni, Frederic Carrier	Remix @Fredz Nova	https://suno.com/song/5ab58238-fae4-4156-a1e6-50b676969614
On Va S'Aimer Encore	Vincent Vallieres	On ca s'aimer encore	https://suno.com/song/a517476f-7f40-40bc-a95e-5b72d732d752
One Kiss	Jessica Reyes	Dua Lipa- one kiss	https://suno.com/song/d6fce2ea-a2b1-47d8-8044-ac50c35f79c3
One Week	Lloyd Edward Elwyn Robertson	One Week (v5 cover)	https://suno.com/song/e9bc7f5d-5e3d-4178-840d-2c04604349c7
Ones Who Love You	Brian Murphy, Alec Fraser O Hanley, Molly Margaret Rankin	Ones Who Love You (Alvvays cover)	https://suno.com/song/ea4eafa5-a87c-4d4b-bbe4-1c8bb8de0638
Ordinaire	Robert Charlebois, Pierre Nadeau, Claudine Monfette	ordinaire (Cover)	https://suno.com/song/9ee0f5d8-ed6d-4619-a252-30fd9306d43f
Paralyzer	Scott Anderson, Sean Robert Anderson, Richard Robert Beddoe, James Ryan Black, Richard Jackett	Paralyzer	https://suno.com/song/7e035f73-0798-4f71-ac26-36e2cb9bb5df

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Passing Out in America	Chris Francis Maurice Hughes, Peter Krpan, Kenny Bridges	PASSING OUT IN AMERICA REMAKE (ALEXISONFIRE)	https://suno.com/song/9389b45e-8c3a-449e-a82b-7d7c1331f4bc
Passing Out in America	Chris Francis Maurice Hughes, Peter Krpan, Kenny Bridges	PASSING OUT IN AMERICA (ALEXISONFIRE)	https://suno.com/song/90c8b5da-dcf8-4850-9adb-db1dedefc772
Photograph	Daniel Patrick Adair, Chad Robert Kroeger, Michael Douglas Henry Kroeger, Ryan Anthony Peake	Nickelback-Photograph (Remix)	https://suno.com/song/c9618021-1048-4c83-b7a2-0bbade5b7fd5
Pieces	Deryck Jason Whibley	Sum 41 - Pieces (Acoustic) (Cover)	https://suno.com/song/cfa9c891-080d-4832-aec8-4e692d33691d
Pieces	Deryck Jason Whibley	Sum 41 - perfect em português	https://suno.com/song/8f82be68-de15-4e9d-bf70-17ec3f5def16
Quitter	Benjamin David Cottrill, Cameron Donald Whitcomb	Cameron Whitcomb - Quitter (Nu Metal cover)	https://suno.com/song/6b4ddd05-bd63-4e70-9927-dbbf4a3a99ec
Rena	James G Cuddy, J Gregory Keelor	Rena Cover Blue Rodeo	https://suno.com/song/29efaf81-2ae4-4bd9-ba13-e043000ef134
Rockstar	Daniel Patrick Adair, Chad Robert Kroeger, Michael Douglas Henry Kroeger, Ryan Anthony Peake	Nickelback - Rockstar-на русском	https://suno.com/song/ff05a0ee-b392-418d-abd0-19e56c2e6f98
Run Away to Mars	Nicholas Beauchamp Durocher, Lauren Mandel, Benjamin Thomas Nudds, James William Connor Riddell	RUN AWAY TO MARS . REMIX.....	https://suno.com/song/a5a2427b-ed22-4d23-9e60-93cea3de55c9

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S.O.S. d'un terrien en détresse (Starmania)	Luc Plamondon	« SOS d'un Terrien en Détresse » SUNO Remix	https://suno.com/song/a8d48a2d-9ef2-4088-b772-ef87f543eece
Sarniezz	Klek De Poitrine, Khn De Poitrine	Sarniezz - Angine de Poitrine - Cover 011	https://suno.com/song/eef3e44e-d8ac-4e9e-9650-e00c4d16ee54
Save Your Tears	Ahmad Balshe, Jason Matthew Quenneville, Abel Tesfaye	Save Your Tears (Cover)	https://suno.com/song/6b911c4b-3500-44fb-a1ff-11b14bdbdb80
Say It Right	Nelly Kim Furtado	Nelly-Furtado-Say-It-Right	https://suno.com/song/b3e2bb17-1c49-40f4-a6c6-5e9576e06d45
Say It Right	Nelly Kim Furtado	Nelly Furtado - Say It Right (Cover)	https://suno.com/song/2de522d9-3db3-4205-8aa8-86f7cb5b156d
She's So High	Talmage Charles Robert Bachman	She's so high	https://suno.com/song/8a1f84e4-46bf-4ee4-84ba-e5ad60e68b32
Sk8er Boi	Avril Ramona Lavigne	Sk8er Boi (K-pop remix) (Avril Lavigne cover)	https://suno.com/song/6555d5ca-08a2-4a36-bb92-ef1152d21d3d
Snowbird	Gene Philip Maclellan	Snowbird	https://suno.com/song/7812a719-f591-440d-8471-55195b4241cd
Something to Talk About	Shirley Eikhard	**) Something to talk about (Cover)	https://suno.com/song/6d627c87-c53d-445b-871f-541d0e8ecd84
Sometimes When We Touch	Daniel Grafton Hill	Sometimes when we touch (cover)	https://suno.com/song/15495aa9-0d7d-48a6-a3bc-34596bf76b9f

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Spirits	Jeremy Drury, Jonathan Hembrey, Darryl Gj James, Brian Leigh Pickett, Isabel Cunningham Ritchie, David Ritter, Joanne Elizabeth Setterington, Simon Alexander Ward	Spirits / The Strumbellas	https://suno.com/song/60ade964-51b2-4634-8df6-03fd29a5740b
Steal My Sunshine	Marc Francis Costanzo	Steal My Sunshine	https://suno.com/song/462797cb-8222-439a-9129-b296b42db377
SugarCrash!	Priya Skye Platt	not really a sugarcrash but the lyrics it is	https://suno.com/song/ff420e38-b0ca-4ae3-b5ba-eaee6df2fe4c
Summer of '69	Bryan Adams, James Douglas Vallance	Summer of 69 (Cover)	https://suno.com/song/a472768a-a9a1-47a8-b0ba-6880176a4450
Sundown	Gordon Lightfoot	[Alt Rock] - ATS - Sundown (Gordon Lightfoot)	https://suno.com/song/b6e47f62-133c-4ba3-b92c-61119c02aaae
Sunglasses at Night	Corey Hart	Sunglasses At Night	https://suno.com/song/3870a76f-cd31-452f-9950-c8cc368f1c1b
Superman’s Dead	Arnold David Lanni, Michael Maida	[Outlaw Country] - ATS - Superman's Dead (Our Lady Peace)	https://suno.com/song/212538d3-65ee-4b20-a121-46aa2d7d036a
Superscar	Liam Israel Benayon	SUPERSCAR - ADÉLA (Remastered)	https://suno.com/song/4a33fb45-c775-4a95-82ce-4ad653aa50d2

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Sweet City Woman	Richard Dodson	Sweet City Woman	https://suno.com/song/7cce1194-9752-474c-944a-bd744ff82dfa
Sweet Sublime	Daniel Groome Kurtz, Ruby Rose Komisar, Samuel Willows	Sweet sublime	https://suno.com/song/e8237e59-b8ff-415d-a7c0-359f61649dab
T'es Dans La Lune	Genevieve Lapointe, Patrick Bourgeois	BB - T'es dans la lune-core (Chuggiest badass verses) Inflames-ish bridges	https://suno.com/song/1124dd60-22b7-4093-987a-c7f1ec070897
Ten in the Bed	Sharon Hampson, Lois Ada Lilienstein, Bram Morrison	Sharon, Lois & Bram - Ten in the Bed (Melody Groove Mix)	https://suno.com/song/1f4109d6-40f1-431b-9e23-ea98805d91d6
TEXAS HOLD 'EM	Nathan John Ferraro, Megan Buelow, Elizabeth Lowell Boland	Beyoncé - TEXAS HOLD 'EM (Lyrics)	https://suno.com/song/4f7da658-d084-4ea7-8e92-9e1e20f04f55
The Big Bang Theory	Steven Jay Page, Lloyd Edward Elwyn Robertson	Big Bang Theory Remix Sphere	https://suno.com/song/ba742406-8f8f-4f89-9f00-577a69e53b84
The Navy Song	Ian D'sa, Jonathan Gallant, Benjamin Ian Kowalewicz, Aaron A Solowoniuk	The Navy Song (Billy Talent Cover) (Remastered)	https://suno.com/song/f12d8236-802a-49b3-b7a9-0cb08106e552
The Safety Dance	Ivan Doroschuk	Men Without Hats - Safety Dance Cover	https://suno.com/song/4182f8b0-37b7-4f71-a8c6-aefd882a40e5
The Spirit of Radio	Neil Elwood Peart, Geddy Lee Weinrib, Alex Zivojinovich	The Spirit of Radio (Nu Metal Version)	https://suno.com/song/d2f9f7e4-1f9d-4616-a905-057cf55ab1e9

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The Wreck of the Edmund Fitzgerald	Gordon Lightfoot	Wreck of the Edmond Fitzgerald (Blues)	https://suno.com/song/7c8043ee-51f4-4880-b18a-6c08bc72d75f
There’s No Solution	Greig Andrew Nori, Deryck Jason Whibley	There's No Solution (Sun 41 Cover)	https://suno.com/song/a5fb637d-ac8f-4a40-b2d6-3b7ea8fa6e6f
This Respirator	Paul Ramirez, Scott Brigham, Chris Cresswell, Jon Darbey	this respirator (the flatliners, cover)	https://suno.com/song/9503fe1c-02fa-4b22-89aa-faeb5f5fbe88
To Build A Home	Patrick Watson	To Build A Home (Cover)	https://suno.com/song/ec9e1673-27a3-4d0b-bb99-6ff6531c494a
Tom Sawyer	Neil Elwood Peart, Geddy Lee Weinrib, Alex Zivojinovich, Paul Phillip Woods	Tom Sawyer (Nu Metal Version)	https://suno.com/song/66afe200-3ddd-430f-a744-f86be921dc74
Too Fast	Jonathan Frederick Lajoie	I arrive too fast (Jon Lajoie)	https://suno.com/song/910cba5e-e788-476a-b8d7-f52052b6f3b8
Toutes les femmes savent danser	Simon Cliche Trudeau, Tim Buron, Alex Guay, Jeff Marco Martinez, Pierre Luc Rioux, Marc Vincent	toute les femmes savent danser	https://suno.com/song/509b86cf-0204-40b3-940e-f6148ad2edcd
Treat You Better	Shawn Mendes	Treat You Better	https://suno.com/song/16cf23c3-3279-4bd1-8044-575b7521a1d4
Turn Me Loose	Paul Warren Dean, Joseph Michael John Reno	Turn Me Loose	https://suno.com/song/52f03b25-bb04-454c-bb42-e5bc5d0835a4
Un peu plus haut	Jean Pierre Ferland	Un peu plus haut, un peu plus loin (K-pop electropop anthem)	https://suno.com/song/c75a3b9c-c365-4aeb-8df8-f7fbc37d4d61

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Verbatim	Ryan Lee Guldemond	Verbatim	https://suno.com/song/6a4ebffc-00d1-4532-95b5-9f381cf316c6
What It Sounds Like	Jenna Lauren Antonia Elyse Hamilton Andrews	WHAT IS SOUNDS LIKE (Saja Boys ver.) (HuntriX cover)	https://suno.com/song/3a28cfeb-b4a1-4fca-8d5a-22dce30c1f95
What It Sounds Like	Jenna Lauren Antonia Elyse Hamilton Andrews	What It Sounds (KPop Demon Hunters) Remix (Remastered)	https://suno.com/song/12936f8a-c46f-452f-9bc2-f39a931a6dd5
What It Sounds Like	Jenna Lauren Antonia Elyse Hamilton Andrews	What It Sounds (KPop Demon Hunters) Remix (Remastered)	https://suno.com/song/ddce95e7-a07f-4bfe-a60c-f1e0c6da5d36
Wrecking Ball	Stephan Moccio	Wrecking Ball - Miley Cyrus Cover	https://suno.com/song/90021872-bbc6-48ef-bd9c-f9414f865515
Young Cardinals	Dallas John Green, Jordan Michael Hastings, Wade Gordon Macneil, George Douglas Pettit, Christopher Raymond Steele	young cardinals	https://suno.com/song/b39ea09d-39fc-42bb-b528-62a75f541dc6

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Boiled Frogs	Dallas John Green, Jordan Michael Hastings, Wade Gordon Macneil, George Douglas Pettit, Christopher Raymond Steele	Boiled Frogs (Alexisonfire cover)	https://suno.com/song/c8e5d81a-1a3b-4275-8113-70678b5481d7
Born To Be Wild	Mars Bonfire	Steppenwolf - Born to be Wild (Moi Mix)	https://suno.com/song/bb589b4e-35a6-4c91-bb2f-28afac28614d
Call Me Maybe	Tavish Joseph Crowe, Carly Rae Jepsen, Joshua Keeler Ramsay	Carly Rae Jepsen Call Me Maybe Suno AI Instrumental (My Version)	https://suno.com/song/23b03380-3c9a-4477-bc60-6737238b3a0a
Everything I Do (I Do It For You)	Bryan Adams	Vanessa-Chantal - Everything I Do (...	https://suno.com/song/1aae8a5a-5ca7-4e89-9a73-dfe4878e4719
Fat Lip	Dave Baksh, Stephen Jocz, Deryck Jason Whibley	Sum 41-Fat lip	https://suno.com/song/f2e7a995-f028-4fcd-803f-6a01c3c723ad
Highest In The Room	Ozan Yildirim, Nik Frascona	HIGHEST IN THE ROOM Cover	https://suno.com/song/7b0cde0a-a11e-469c-bc8b-9cfbc742d319
I'm Just a Kid	Arnold David Lanni, Sebastien Lefebvre, Jean Francois Stinco	Simple Plan - Iam Just A Kid	https://suno.com/song/4b4f0ed6-8fb7-43f2-a8c5-059ebc9ac6d5
Life is a Highway	Thomas William Cochrane	Life Is a Highway	https://suno.com/song/90ac6cb2-a4a3-4add-bd96-caf17546874f

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One Week	Lloyd Edward Elwyn Robertson	One Week (Celtic Punk Cover)	https://suno.com/song/8a945125-0e00-4b47-89d3-bfeaa6501ae4
Save Your Tears	Ahmad Balshe, Jason Matthew Quenneville, Abel Tesfaye	The Weeknd - Save Your Tears remix 1950	https://suno.com/song/258bee9b-c7f0-4d20-a5ba-9c79e9a2598d
Say It Right	Nelly Kim Furtado	Nelly Furtado - Say It Right - Cover	https://suno.com/song/9f94fc05-7591-4af9-8884-b9d251b89404
Someday	Chad Robert Kroeger, Michael Douglas Henry Kroeger, Ryan Anthony Peake, Ryan Vikedal	Nickelback -Someday - на русском	https://suno.com/song/3a950325-49a7-4601-8f06-918eabfc9bff
Summer of '69	Bryan Adams, James Douglas Vallance	SUMMER OF '69	https://suno.com/song/1f061c3f-35c7-4eb9-9af4-16a6c1c8eda7
Sunglasses at Night	Corey Hart	Sunglasses At Nights x Shades of Love Mashup	https://suno.com/song/b78a5cfd-f86a-4646-8b52-95288c99d4a9
What It Sounds Like	Jenna Lauren Antonia Elyse Hamilton Andrews	This is what it sounds like [Piano Cover]	https://suno.com/song/3a24932c-0348-4877-8c27-fa11ac31d8bd