UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALEC PILAVIAN and FRANK RICHARD RUGNETTA, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

SUNO, INC.,

Defendant.

Civil Action No. 1:26-cv-13400-ADB

[PROPOSED] ORDER AMENDING CONSOLIDATION ORDER, SUBSTITUTING INTERIM CO-LEAD COUNSEL, CHANGING CAPTION, AND RESETTING PLEADING DEADLINE

Upon consideration of the joint motion and supporting memorandum, and for good cause shown, the joint motion and Plaintiffs' request to substitute interim co-lead counsel are GRANTED. The Court's August 24, 2026 Order Consolidating Related Actions, Appointing Interim Co-Lead and Liaison Counsel, and Setting Pleading Schedule, ECF No. 17, as subsequently modified (the "Existing Order"), is amended as follows:

1. **Consolidation of *Beckham*.** With the agreement of counsel for Michael Beckham and Defendant Suno, Inc., paragraphs 1 and 2 of the Existing Order are amended to include *Beckham v. Suno, Inc.*, No. 1:26-cv-14065 (D. Mass.), as a related action under D. Mass. L.R. 40.1(g). Pursuant to Fed. R. Civ. P. 42(a), *Beckham* is consolidated with this action on the same terms as the existing consolidated actions.

2. **Later-filed related actions.** Later-filed actions asserting claims against Suno arising from the same alleged November 2025 data breach shall also be consolidated once pending in this District, related under D. Mass. L.R. 40.1(g), and assigned or reassigned

to the presiding judge. A party seeking application of this provision shall file a notice of related action on both dockets and serve the notice and the applicable consolidation orders on all parties in both actions under Fed. R. Civ. P. 5. Unless a party objects within 14 days after completion of that service, subject to Fed. R. Civ. P. 6, the later action shall be consolidated without further motion or order. A timely objection shall be resolved by the Court before consolidation of the affected action.

3. ***Beckham* docket.** Paragraph 3 of the Existing Order is amended to direct the Clerk to reflect the consolidation on the docket of *Beckham v. Suno, Inc.*, No. 1:26-cv-14065, and then administratively close that matter, subject to reopening for good cause. Administrative closure shall not dismiss any claim or adjudicate its merits.

4. **Amended caption.** The caption of the consolidated action is changed to "*In re Suno Data Breach Litigation*," with Civil Action No. 1:26-cv-13400-ADB remaining the lead case number. The Clerk shall update the lead docket accordingly. All subsequent filings in the consolidated action shall bear the amended caption.

5. **Interim co-lead and liaison counsel.** Pursuant to Fed. R. Civ. P. 23(g)(3), Nicholas Andrew Hall of Hall Attorneys, P.C., is substituted for Casondra Turner of Milberg, PLLC, as Interim Co-Lead Class Counsel, serving with Gerald D. Wells III of Lynch Carpenter, LLP.[1] Mr. Hall shall assume the co-lead responsibilities assigned under the Existing Order and commit the time and resources reasonably necessary to discharge those duties. David Pastor of Pastor Law Office, PC, shall remain Interim Liaison

[1] On September 29, 2026, Casondra Turner filed a notice of withdrawal as counsel of record for Plaintiffs. Notice of Withdrawal 1, ECF No. 20.

Counsel. This substitution concerns the interim co-lead counsel designation only and does not dispense with any admission requirement under D. Mass. L.R. 83.5.3.

6. **Consolidated Amended Complaint.** Plaintiffs shall file their Consolidated Amended Complaint within 30 days after entry of this Order, calculated under Fed. R. Civ. P. 6(a). This deadline supersedes any previously established deadline for that filing.

7. **Remaining provisions and response period.** Except as expressly modified by this Order, the existing orders shall remain in effect, including Suno's applicable period to answer, move, or otherwise respond, measured from the filing of the Consolidated Amended Complaint. Consolidation of later-filed actions shall not independently restart the pleading schedule absent further order of the Court.

SO ORDERED.

Dated: October 26, 2026

Hon. Allison D. Burroughs
United States District Judge