

EXHIBIT 2

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

AUBREY DRAKE GRAHAM,

Plaintiff,

- against -

UMG RECORDINGS, INC.,

Defendant.

Case No. 25-cv-00399

Hon. Jeannette A. Vargas

**PLAINTIFF’S AMENDED INITIAL DISCLOSURES PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 26(e)**

Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, Plaintiff Aubrey Drake Graham (“Drake” or “Plaintiff”), through his undersigned counsel, hereby makes the following Amended Initial Disclosures (the “Amended Disclosures”). These Amended Disclosures are based upon information reasonably available to Plaintiff at the present time. Plaintiff reserves the right to supplement, revise, and/or correct these Amended Disclosures as he obtains additional information. Furthermore, Plaintiff makes these Amended Disclosures without waiver of, or prejudice to, any current or future objections Plaintiff may have, and Plaintiff expressly reserves all objections. Nothing in these Amended Disclosures constitutes, or is intended to constitute, a waiver of any claim, right, or defense in this case or otherwise.

- I. Fed. R. Civ. P. 26(a)(1)(A)(i): The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.**

Based on current knowledge, information, and belief and subject to further investigation, discovery, and analysis by experts, Plaintiff discloses the following individuals. Plaintiff reserves

the right to amend or supplement these disclosures as provided under Fed. R. Civ. P. 26(e). Plaintiff further incorporates by reference herein each individual and entity identified in a Rule 26 disclosure by any other party to this litigation. The following disclosures do not include persons whose testimony is likely to be used solely for impeachment, rebuttal, or expert witness testimony. Where known, Plaintiff has provided the addresses and telephone numbers of the listed individuals.

Name and Title	Contact Information	General Subject Matter
Plaintiff Aubrey Drake Graham	c/o counsel Michael Gottlieb Willkie Farr & Gallagher 1875 K St. NW Washington, DC 20006	All causes of action
Defendant UMG Recordings, Inc.	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action
Ramon Alvarez-Smikle (EVP, Head of Digital Marketing, Interscope)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's use of covert tactics to promote the Defamatory Material
Kojo Menne Asamoah	722 Jackson Street, Los Angeles, California 90012	Defendant's use of covert tactics to promote the Defamatory Material
Jordan Bell (Urban Influencer and Content Marketing, Interscope)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's use of covert tactics to promote the Defamatory Material
Steve Berman (President of Marketing, Interscope)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action

Name and Title	Contact Information	General Subject Matter
Anthony Bucher a/k/a Tony the Hitmaker	Hitmaker Services Inc. 81 Lake Ridge Road Santa Rosa Beach, FL 32459 tony@hitmakerservice.com	Defendant's use of covert tactics to promote the Defamatory Material
Tiffany Bullock (Senior Manager, Influencer and Content Marketing, Interscope)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's marketing of the Defamatory Material
Laura A. Carter	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's use of covert tactics to promote the Defamatory Material
Jesse Collins (Roc Nation)	% Jennifer Justice General Counsel and Executive Vice President (EVP) Roc Nation, LLC 540 West 26th Street New York, NY 10001	Defendant's licensing and performance of the Defamatory Material at the 2025 Super Bowl
Vincenza Conticchio (Video & Creative Content Commissioner, Interscope)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Knowledge relating to Defamatory Material
Bill Evans (Interscope EVP Urban Promotion)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action
David Isaac Friley	235 Ocean Park Blvd, Apt B, Santa Monica, CA, 90405	All causes of action
Jody Gerson (CEO of UMPG)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's use of covert tactics to promote the Defamatory Material

Name and Title	Contact Information	General Subject Matter
Sir Lucian Grainge (CEO UMG)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action
Jeffrey Harleston	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action
John Janick (CEO Interscope.)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action
David Kaefer (VP, Head of Music and Audiobooks Business at Spotify USA Inc.)	% Jonathan M. Sperling Phillip Hill Covington & Burling LLP The New York Times Building 620 Eighth Avenue New York, NY 10018 (212) 841-1000 jsperling@cov.com pahill@cov.com	Defendant's promotion and licensing of the Defamatory Material; Defendant's use of covert tactics to promote the Defamatory Material; Metrics related to publication of the Defamatory Material on music streaming platform.
Joshua Delseni a/k/a Josh Kaplan	1011 Lake Avenue Wilmette, IL 60091-1763 1525 N. Elston Avenue, 2nd Floor Chicago, IL 60642 josh@imgroup.io	Defendant's use of covert tactics to promote the Defamatory Material
Andrew Kronfeld (UMG EVP Marketing)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's use of covert tactics to promote the Defamatory Material
Annie Lee (COO Interscope)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's use of covert tactics to promote the Defamatory Material

Name and Title	Contact Information	General Subject Matter
Avery Lipman (President Republic Records)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action
Monte Lipman (CEO Republic Records)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action
Faatimah Mahadi (Marketing Coordinator, Interscope)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's marketing of Defamatory Material
Lane Mankoff	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's use of covert tactics to promote the Defamatory Material
Gary Marella	26261 Veva Way, Calabasas, CA, 91302	Defendant's use of covert tactics to promote the Defamatory Material
Greg Marella (President of Promotion and EVP, Capitol Music Group)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action
Pooja Mehta	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's use of covert tactics to promote the Defamatory Material
Boyd Muir (CFO and EVP UMG)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's profit from publication and promotion of Defamatory Material

Name and Title	Contact Information	General Subject Matter
Luis Najera (Senior Manager Digital Marketing, Interscope)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's marketing of Defamatory Material
Michael Nash (Chief Digital Officer UMG)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action
Lola Plaku	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action
Jim Roppo (President and COO Republic)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	All causes of action
Anthony Saleh	% Brian D. Caplan Reitler Kailas & Rosenblatt LLP 885 Third Avenue, 20th Floor New York, NY 10022 bcaplan@reitlerlaw.com	All causes of action
Mark Seepersaud (Director Analytics, Interscope)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Spread of the Defamatory Material
Jessica Staas (VP, International Digital Strategy, Interscope)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's use of covert tactics to promote the Defamatory Material
Will Tanous (EVP, Chief Administrative Officer, UMG)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's use of covert tactics to promote the Defamatory Material

Name and Title	Contact Information	General Subject Matter
Nicole Wyskoarko (President/Head of Urban A&R, Interscope)	% Rollin A. Random Sidley Austin 350 South Grand Avenue Los Angeles, CA 90071 rransom@sidley.com	Defendant's agreements with Kendrick Lamar Duckworth
Amazon Music	% Stephen Worth Associate General Counsel & Director: Amazon Music, Podcasts and Wondery Amazon Legal Department 410 Terry Avenue North Seattle, WA 98109-5210	Defendant's promotion and licensing of the Defamatory Material; Metrics of the Defamatory Material on Amazon Music
Apple Inc.	% Jean-Paul Jassy Jassy Vick Carolan LLP 355 S. Grand Ave., Suite 2450 Los Angeles, CA 90071 jppjassy@jassyvick.com	Defendant's use of covert tactics to promote the Defamatory Material; Metrics of the Defamatory Material on Apple Music; Defendant's licensing, performing, and promotion of the Defamatory Material at the 2025 Super Bowl
Audiomack	% Audiomack Inc. 648 Broadway New York, US	Defendant's licensing of the Defamatory Material; Metrics of the Defamatory Material on Audiomack
Billboard Media, LLC	% Todd Greene Chief Legal Officer Penske Media Corporation 11355 W. Olympic Blvd. Los Angeles, CA 90064	Defendant's use of covert tactics to promote the Defamatory Material
Complex Networks	% Endi Piper General Counsel 229 West 43rd Street 9th Floor New York, NY 10036 (917) 793-5868	Defendant's use of covert tactics to promote the Defamatory Material

Name and Title	Contact Information	General Subject Matter
Deezer Inc.	% Florence Lao General Counsel Deezer Inc. 527 Howard St., Floor 4 San Francisco, CA 94105	Defendant's licensing of the Defamatory Material; Metrics of the Defamatory Material on Deezer
Fox Corporation	% Adam G. Ciongoli Chief Legal and Policy Officer Fox Corporation 2121 Avenue of the Stars Los Angeles, CA 90067	Defendant's licensing and playing of the Defamatory Material at the 2025 Super Bowl; Viewership metrics of the 2025 Super Bowl; Decision to play the Defamatory Material at the 2025 Super Bowl
Instagram	% Jennifer Newstead Chief Legal Officer Meta Platforms, Inc. 1 Meta Way Menlo Park, CA 94025	Defendant's licensing of the Defamatory Material; Defendant's use of covert tactics to promote the Defamatory Material; Metrics of the Defamatory Material on Instagram
Last.fm	% Caryn Groce Executive Vice President, Acting General Counsel Paramount Global 1515 Broadway, New York, NY 10036	Defendant's licensing of the Defamatory Material; Defendant's use of covert tactics to promote the Defamatory Material; Metrics of the Defamatory Material on Instagram
Napster Music Inc.	Legal Department Rhapsody International Inc. 1411 4th Avenue, Suite 1200 Seattle, Washington 98101 USA legal@napster.com	Defendant's licensing of the Defamatory Material; Metrics of the Defamatory Material on Napster
National Academy of Recording Arts and Sciences, Inc. d/b/a Recording Academy	% Jennifer Jones Executive Vice President of Legal Affairs 3030 Olympic Blvd. Santa Monica, CA 90404	Actions taken by Defendant to have the Defamatory Material featured at the 2025 Grammy Awards; Decision to alter video of the 2025 Grammy

Name and Title	Contact Information	General Subject Matter
		Awards that is available publicly
National Football League	% Jeff Pash General Counsel National Football League 345 Park Avenue 5th Floor New York, NY 10154 Jeff.Pash@nfl.com	Decision to have Kendrick Lamar Duckworth headline the 2025 Super Bowl; Defendant's licensing of the Defamatory Material at the 2025 Super Bowl; Decision to have the Recording performed at the 2025 Super Bowl; Viewership metrics of 2025 Super Bowl and previous Super Bowls
p.g. LANG, LLC d/b/a pgLang	16217 Kittridge Street Van Nuy, CA 91406	All causes of action
Penske Media Corporation	% Todd Greene Chief Legal Officer Penske Media Corporation 11355 W. Olympic Blvd. Los Angeles, CA 90064	Defendant's use of covert tactics to promote the Defamatory Material
Qobuz	% XANDRIE SA 45 rue de Delizy 93692 Pantin Cedex, France qobuz@qobuz.com	Defendant's licensing of the Defamatory Material; Metrics of the Defamatory Material on Qobuz
Roc Nation, LLC	% Kim Miale General Counsel Roc Nation, LLC 540 West 26th Street New York, NY 10001	Decision to have Kendrick Lamar Duckworth headline the 2025 Super Bowl; Defendant's licensing of the Defamatory Material at the 2025 Super Bowl; Decision to have the

Name and Title	Contact Information	General Subject Matter
		Recording performed at the 2025 Super Bowl
Sirius XM Holdings Inc.	% Richard N. Baer Executive Vice President, General Counsel and Secretary Sirius XM Holdings Inc. 1221 Avenue of the Americas 35th Floor New York, NY 10020	Defendant's licensing of the Defamatory Material; Metrics of the Defamatory Material on Sirius XM
SoundCloud Inc.	71 Fifth Avenue, 5th Floor New York, NY 10003	Defendant's licensing of the Defamatory Material; Metrics of the Defamatory Material on SoundCloud
Spotify USA, Inc.	% Jonathan M. Sperling Phillip Hill Covington & Burling LLP The New York Times Building 620 Eighth Avenue New York, NY 10018 (212) 841-1000 jsperling@cov.com pahill@cov.com	Defendant's promotion and licensing of the Defamatory Material; Defendant's use of covert tactics to promote the Defamatory Material; Metrics of the Defamatory Material on Spotify
TIDAL	% Truan Savage General Counsel 799 Broadway, 12th Floor New York, NY 10003	Defendant's licensing of the Defamatory Material; Metrics of the Defamatory Material on TIDAL
TikTok	% John Rogovin Global General Counsel 5800 Bristol Parkway, Suite 100 Culver City, CA 90230	Defendant's licensing of the Defamatory Material; Metrics of Defamatory Material on TikTok
Twitch Interactive, Inc.	% Steve Bené General Counsel Twitch Interactive, Inc. 350 Bush Street, 2nd Floor San Francisco, CA 94104	Defendant's use of covert tactics to promote the Defamatory Material; Defendant's licensing of the Defamatory Material;

Name and Title	Contact Information	General Subject Matter
		Metrics of the Defamatory Material on Twitch
Universal Music Group N.V.	% Jeffrey Harleston General Counsel and Executive Vice President of Business & Legal Affairs 's-Gravelandseweg 80, 1217 EW Hilversum The Netherlands	All causes of action
Vevo LLC	% Alexander Kisch EVP, Business Development & Affairs, General Counsel 151 W 42nd Street, 25th Floor New York, NY 10036	Defendant's use of covert tactics to promote the Defamatory Material; Defendant's licensing of the Defamatory Material; Metrics of the Defamatory Material on Vevo
YouTube	% Halimah DeLaine Prado General Counsel Google LLC, d/b/a YouTube 901 Cherry Avenue San Bruno, CA 94066	Defendant's use of covert tactics to promote the Defamatory Material; Defendant's licensing of the Defamatory Material; Metrics of the Defamatory Material on YouTube

II. Rule 26(a)(1)(A)(ii): A copy—or a description by category and location—of all documents, electronically store information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Based on current knowledge, and subject to further investigation, discovery, and analysis by experts, Plaintiff hereby discloses the following categories of documents and information. Plaintiff reserves the right to amend or supplement these disclosures as provided under Fed. R.

Civ. P. 26(e). The following disclosures do not include documents and things that are likely to be offered solely for impeachment.

1. Documents in Plaintiff's own custodial files, to be collected and produced in discovery, including emails, audio and video recordings, and other electronic documents; and
2. Documents referenced in the Complaint.

III. Rule 26(a)(1)(A)(iii): A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

As set forth in his Complaint, Plaintiff seeks declaratory relief, injunctive relief, and monetary damages in an amount to be determined at trial. Plaintiff's damages are ongoing and continuing. Plaintiff reserves the right to seek other damages in this action. The computation of Plaintiff's damages requires expert testimony and discovery. Thus, the computation of damages at this stage is premature. Once discovery has been conducted and Plaintiff's expert(s) have analyzed damages, this computation will be provided to Defendant.

For his defamation claim, Plaintiff need not prove actual damages to establish liability because Defendant's statements constituted defamation *per se*. Plaintiff is entitled to recover damages in the form of, *inter alia*, nominal, compensatory, and punitive damages; attorneys' fees and costs; and prejudgment and post-judgment interest. Plaintiff seeks general, actual, consequential, and special damages in an amount to be determined at trial based on expert opinion and analysis.

For his harassment claim, Plaintiff is entitled to recover damages in the form of, *inter alia*, nominal, compensatory, and punitive damages; attorneys' fees and costs; and prejudgment and post-judgment interest. Plaintiff seeks general, actual, consequential, and special damages in an amount to be determined at trial based on expert opinion and analysis.

For his deceptive business practices claim, Plaintiff seeks statutory and actual damages in an amount to be determined at trial based on expert opinion and analysis, plus treble damages and attorneys' fees and costs pursuant to Section 349 of the New York General Business Law, as well as prejudgment and post-judgment interest.

IV. Rule 26(a)(1)(A)(iv): For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Plaintiff responds that the information sought by this portion of the Rule is inapplicable to Plaintiff.

Dated: June 2, 2025

By: /s/ Michael J. Gottlieb

Michael J. Gottlieb

Meryl C. Governski (admitted *pro hac vice*)

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Counsel for Plaintiff Aubrey Drake Graham