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9   **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10   **SANTA CLARA COUNTY**

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DAVID L. GREENE
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               Plaintiff,
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    v.
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GOOGLE LLC, and ALPHABET INC.,
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               Defendants.
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Case No. 26CV485291	

COMPLAINT FOR:

(1) RIGHT OF PUBLICITY CAL. CIV. CODE
    § 3344
(2) UNFAIR COMPETITION
(3) COMMON LAW RIGHT OF PUBLICITY
(4) UNJUST ENRICHMENT

DEMAND FOR JURY TRIAL

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Mr. David L. Greene files this Complaint against defendants Google LLC and Alphabet Inc. ("Google" or "Defendants"), and in support states the following.

I. INTRODUCTION

1. This case arises from Google's deliberate acts of theft. Google used Mr. Greene's voice without authorization and then used those stolen copies to develop, train, and refine its AI broadcasting product, *NotebookLM*.

2. Mr. Greene is a renowned radio and podcast personality. His decades-long career includes hosting and moderating the following programs:

      a. *Morning Edition* (NPR)

      b. *Up First* (NPR)

      c. *Sports in America with David Greene* (nominated for a 2026 Ambie Award)

      d. *Ukraine Stories*

      e. *Left, Right & Center*

      f. *David Greene is Obsessed*

      g. *In the Moment with David Greene*

      h. *Reign of Error*

3. These programs reach millions of listeners and have made David Greene one of the most well-known and respected radio and podcasting voices of his time. Without his consent, Google sought to replicate Mr. Greene's distinctive voice—a voice made iconic over decades of decorated radio and public commentary—to create synthetic audio products that mimic his delivery, cadence, and persona. One media observer even noted that the voice "sounded *eerily like former 'Morning Edition' host David Greene*." (emphasis added). This is inexcusable exploitation. Google freely profits from the reputation and personality Mr. Greene built over his lifetime, and the laws of this country and state simply do not permit it.

4. When Google recently launched its AI podcasting product, as part of its AI suite known as *NotebookLM*, Google created the software using, in part, Mr. Greene's voice.

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Indeed, *NotebookLM* allows Google users to create podcasts with Mr. Greene's voice, manner of delivery, and personality. And at least for the past year, hundreds of thousands of users (if not millions) have, in turn, created millions of podcasts using his voice because of the appeal of the content being delivered with all the goodwill and appeal that is associated with Mr. Greene, which, in turn, contributes to the popularity and growth of *NotebookLM*.

5.   *NotebookLM* received an avalanche of public attention and glowing media coverage. Tech commentators praised its ability to generate customized news and analysis, with headlines heralding a supposed breakthrough in consumer AI and the podcast industry. Google could have done the right thing by paying the personalities and creators they used to create *NotebookLM*. Instead, it celebrated this success not by acknowledging them, but by boasting about its record-breaking profits.

6.   In the first quarter following the product's release, Google announced that it had earned billions in profits, in part due to the success of *NotebookLM*. What Google failed to mention in their Q1 2025 call was that it had misappropriated a beloved public radio and podcast host's career, identity, and livelihood as raw material for a tech company's bottom line without any compensation.

7.   Podcasting offers a way to pause, listen, and stay connected to current events. Podcasts are now critical across industries, including entertainment, advertising, marketing, education, and other corporate sectors. They serve as indispensable tools for communicating and explaining the latest developments in pop culture, music, movies, television, politics, historical events, and more. Unlike social media, where quick-takes and viral moments often dominate, podcasts create space for thoughtful, long-form conversations. Podcasts encourage listeners to slow down and engage deeply with ideas; a rare and much-needed experience in today's fast-paced society. Media personalities create recordings and offer their perspectives. Traditionally, these recordings were made in commercial studios, but are now more frequently recorded, produced, and edited by the creators themselves, using equipment and software that they have personally purchased. The recordings are then edited, revised, or re-recorded as needed, and the final recording is laid into the show or presentation.

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8.   Google's theft of Mr. Greene's voice is intentional and knowing. Media personalities are typically and consistently paid a negotiated amount for the use of their voices. The negotiated amount is a function of the actor's name, brand value, where it will be used, and the duration of its use. Payments typically include upfront fees, royalties, residuals, or some combination of these payments. For example, Speechify, an AI-powered platform that can "turn anything into a podcast," entered into licensing contracts with public figures (including Gwyneth Paltrow, Snoop Dogg, and MrBeast) before creating AI versions of their voices for the platform. Speechify's founder, Cliff Weitzman, highlighted the value of using real voices to train AI-products, stating, "people build a very strong affinity for the voices they use in Speechify . . . people feel so close to the voice and they want to support the creator more," and "people are coming [to Speechify] because they have an existing strong relation with the creator and they want to support the creator more."[1]

9.   Failure to pay the negotiated and agreed-upon price for such professional services, is a violation of multiple statutes and common law.

10.   Defendant Google is attempting to disrupt the podcast industry. Google offers a service that enables clients and the general public to create podcast narrations at a fraction of the time and cost of the traditional model. Google achieves this by allowing customers to upload a script to its AI-driven software, *NotebookLM*, and generate a professional-grade voiceover based on specified criteria.

11.   For example, Google users can choose between and designate their preference for male or female voices, regional accents, and older or younger-sounding voices that enable users to upload content, including PDFs, text files, websites, YouTube video links, and copied text, to a "notebook." Each notebook is a folder that can contain up to fifty content items. These notebooks can then be developed into a comprehensive podcast with hosts discussing a

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[1] Jordan Wilson, *Turning Snoop Dogg's Voice into AI: The Speechify Story - Everyday AI Chat with Cliff Weitzman*, YOUTUBE (Everyday AI) (Nov. 27, 2023), https://www.youtube.com/watch?v=LgWyOhHaeUA.

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particular subject.[2] On information and belief, and based on this, Mr. Greene alleges that his voice is not just the default voice option, but among the most popular for generative podcasts and is consistently chosen by *NotebookLM* users to create new content.

12.   Rather than being programmed traditionally, an LLM is "trained" by copying a massive corpus of text and media and extracting both the facts and the creative expression of these ideas, sounds, and depictions from the data. This body of text is referred to as the training dataset. Training datasets are used in various ways: to pre-train and fine-tune models, to study the general knowledge and expressive abilities of models, and as a means of testing "memorization" or the models' innate tendency to output copies of their training data, including the material on which they were trained. This is why data matters so greatly to generative AI.

13.   A large language model's output is largely reliant on the material in its training dataset. It can only output facts and creative expressions if it has been trained on those specific types of data. It cannot "reason" beyond what it has copied from its training data: LLMs do not invent anything new. *NotebookLM* is trained to answer questions based on information provided from a user's uploaded sources and does not have the capacity to answer questions beyond that scope.[3]

14.   What makes Google's *NotebookLM* stand out from other generative AI tools is its audio and video output function, which is achieved by incorporating filler words and peculiar phrasing when generating responses to prompts. Based on the training data provided to the LLM, inflections and tenors are incorporated to make the text sound and appear more realistic and conversational.[4] Google ostensibly believes that its multi-billion-dollar

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[2] In this Complaint, unless otherwise indicated, "LLM" refers to all versions of Google's Large Language Models in any stage of their development and lifecycle—including initial data-sourcing and processing, pre-training, post-training or fine-tuning, and validating or benchmarking—whether or not the version was marketed, distributed, or sold to the public or any third-parties.
[3] *Learn about NotebookLM,* GOOGLE, https://support.google.com/notebooklm/answer/16164461?sjid=2253558431283180752-NC
[4] Aisha Malik, *Google's AI Note-Taking App NotebookLM Can Now Explain Complex Topics*

(Footnote Continued on Next Page.)

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investment in generative AI technology will bolster and define the company's commercial and competitive advantage in the market for years to come.

15. However, with these advancements come ethical challenges, including concerns around content authenticity. Additionally, AI's growing role in content creation raises broader concerns about the shifting dynamic between human creators and their audiences.

16. Plaintiff David Greene is an award-winning journalist and renowned podcast host who owns his name, image, and likeness. Mr. Greene did not consent to the use of his name, image, and likeness as training material in any version of *NotebookLM* or any Google LLM, despite a vibrant market for mining content for AI training data, a market in which Google participates. Yet, Google downloaded, copied, and/or otherwise imitated Mr. Greene's voice without his consent and without any just compensation. That Google sought to replicate Mr. Greene's voice and personality for both training and output is evidenced by the generative podcasts created, because his singular voice, including even mannerisms, cannot and would not be in the podcast productions without having been in the training data in the first place. That should have never happened without his permission, and Google certainly did not seek his permission to use it in the sale of *NotebookLM* thereafter.

17. The default option for this podcasting functionality is Mr. Greene's voice, which projects prominently in the default output following the inserted prompt requested by *NotebookLM*.

18. Defendants have not acknowledged Mr. Greene's contribution, obtained permission from Mr. Greene to use his voice, performance, and words, nor provided compensation. While Defendants have received praise for their innovation in the artificial intelligence space and substantial profits from *NotebookLM*, Mr. Greene has received nothing–no acknowledgment, no credit, no remuneration of any kind.

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to You Out Loud, TECHCRUNCH (Sep. 11, 2024), https://techcrunch.com/2024/09/11/googles-ai-note-taking-app-notebooklm-can-now-explain-complex-topics-to-you-out-loud/.

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19. Google's exploitation of Mr. Greene's likeness extends far beyond the classic cases of voice-based misappropriation considered in *Midler v. Ford Motor Co.*, 849 F.2d 460 (9th Cir. 1988), and *Waits v. Frito-Lay, Inc.*, 978 F.2d 1093 (9th Cir. 1992). Here, Google has not only unlawfully appropriated a recognizable voice and persona, but also packaged and commercialized that persona into an endlessly reusable consumer product, normalizing and incentivizing the unauthorized replication of individuals' identities. Without judicial intervention, Google's conduct will have lasting repercussions, fundamentally reshaping the entertainment and media landscape, and endangering the rights of content creators to control and benefit from their own voices, likenesses, and creative output.

20. Mr. Greene brings this action to put a stop to the deliberate taking and use of his voice, to recover damages, and to ask that Defendants be required to disgorge their ill-gotten profits for the same.

II. PARTIES

21. Plaintiff David Greene is an award-winning journalist and New York Times best-selling author who lives in California. He owns the rights to his own name, image, voice, and likeness.

22. Mr. Greene hosted NPR's award-winning news program *Morning Edition* for nearly a decade. He also hosted NPR's popular morning news podcast, *Up First*, guiding listeners through turbulent elections, a world-altering pandemic, and ongoing struggles with social change in the United States. Mr. Greene stepped away from *Morning Edition* in 2021 and co-founded a media company, Fearless Media. Mr. Greene now serves as the new host and producer of *Left, Right & Center*, a leading political podcast on KCRW, NPR's flagship member station in Southern California. This hour-long podcast has provided public commentary since 1996.

23. Defendant Google LLC is a Delaware limited liability company with its principal place of business at 1600 Amphitheatre Parkway, Mountain View, California 94043. Defendant Google is a wholly owned and controlled subsidiary of XXVI Holding Inc., which

is a subsidiary of Defendant Alphabet. Google is the alter ego and agent of Defendant Alphabet.

24.   Defendant Alphabet Inc. is a Delaware corporation with its principal place of business at 1600 Amphitheatre Parkway, Mountain View, California 94043. Defendant Alphabet wholly owns and controls Defendants Google and YouTube. Defendant Alphabet is the alter ego of Defendant Google.

25.   Each Defendant deals with and earns revenue from consumers through paid subscriptions throughout the United States. Google AI Pro is a paid subscription that provides members with expanded access to select AI programs developed by Google, including *NotebookLM*.

III.   JURISDICTION AND VENUE

26.   This Court has subject matter jurisdiction over this action pursuant to Cal. Code Civ. Proc. § 410.10 and Article VI, § 10 of the California Constitution.

27.   This Court has personal jurisdiction over the Defendants because Defendants have sufficient minimum contacts in California, and otherwise intentionally avail themselves of the California market so as to render the exercise of jurisdiction over them by California courts consistent with traditional notions of fair play and substantial justice. Indeed, Google's headquarters (the Defendants' principal place of business) is in Mountain View, CA. Moreover, the acts and omissions detailed herein occurred in California.

28.   Venue is proper in this Court because a substantial portion of the events and actions giving rise to the claims in this matter took place in Santa Clara County. Furthermore, Defendants Alphabet Inc. and Google LLC are headquartered in Santa Clara County and are subject to personal jurisdiction in this Court.

29.   Defendants also direct and control a large workforce of employees throughout Santa Clara County, California, and have agents, employ individuals, and/or transact business in the State of California, County of Santa Clara.

IV.   AGENTS AND CO-CONSPIRATORS

30.   The unlawful acts alleged against the Defendants in this complaint were

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authorized, ordered, or performed by the Defendants' respective officers, agents, employees, representatives, or shareholders while actively engaged in the management, direction, or control of Defendants' businesses or affairs. Defendants' agents operated under the explicit and apparent authority of their principals. Defendants and their subsidiaries, affiliates, and agents operated as a single, unified entity.

31.   Various persons and/or firms not named as Defendants may have participated as co-conspirators in the violations alleged herein. They may have performed acts and made statements in furtherance thereof. Each acted as the principal, agent, or joint venture of, or for other Defendants with respect to the acts, violations, and ordinary course of conduct alleged herein.

V.   FACTUAL ALLEGATIONS

A. DEFENDANTS' ENTRY INTO THE ARTIFICIAL INTELLIGENCE INDUSTRY.

32.   Google is a diversified internet company that creates, markets, and sells software and hardware technology products, including those referred to as Artificial Intelligence.

33.   Artificial intelligence, commonly abbreviated "AI," is software designed to copy and simulate human reasoning, creativity, expression, and performance. "Generative AI" refers to AI that can create content, such as text, images, video, and audio, using software and AI in response to user prompts.

34.   In July 2023, Google released the initial version of its AI product called *NotebookLM*.[5] *NotebookLM* is a series of large language models, which are sets of AI software designed to parse and emit natural language.

35.   Google's AI product *NotebookLM*, and other related or non-related products from Google, downloaded, trained on, and thereby misappropriated Mr. Greene's voice and/or recordings featuring his voice, using the same as *inputs*. Further, Mr. Greene alleges that

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[5] James Vincent, *Google Teases Project Tailwind - A Prototype AI Notebook That Learns from Your Documents*, THE VERGE (May 10, 2023), https://www.theverge.com/2023/5/10/23718707/google-io-2023-project-tailwind-personal-ai-notebook.

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Google produces and/or allows the production or creation of *outputs* with these products in a manner that intentionally seeks to emulate and/or imitate Mr. Greene's voice, or otherwise deceive (and does indeed deceive) listeners into believing that the voice is Mr. Greene's. And finally, Mr. Greene alleges that Google unlawfully and inequitably profits from (or seeks to profit from and/or eventually will benefit from) the same.

B. LAUNCH AND SUCCESS OF GOOGLE'S *NOTEBOOKLM*.

36.   What started as a modest announcement of the prototype *Project Tailwind* at Google I/O in May 2023 has evolved into *NotebookLM*.

37.   According to those in the tech industry, *NotebookLM* is considered an "AI powerhouse that's turning heads among researchers, students, and professionals. It's not just another note-taking app—it's your personal information synthesizer that might make you question whether AI is getting too good at understanding what we read."[6]

38.   *NotebookLM*'s technology derives from *AudioLM*, a language model designed by Google, which is intended to refine audio in ways that make it sound indistinguishable from real recordings. Whether they be speech, music, or environmental sounds, these "audio signals" can be understood at many levels of detail. Speech, for example, can be analyzed at a local acoustic or phonetic level, but also in terms of prosody, syntax, grammar, or semantics.

39.   *AudioLM* trains on audio, including audio produced by *SoundStream*, also developed by Google, enhancing it into high-resolution speech. One of *AudioLM's* core functions is its ability to generate coherent speech that aligns across phonetics, syntax, and semantics without relying on written text annotations.[7]

40.   A combination of (1) his fame and reputation, (2) the outputs closely matching his voice, and (3) the data available to Google, such as its or its partners' technical ability to

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[6] Fru Louis, *3 Things You Need to Know about Google's New NotebookLM*, MEDIUM (Nov. 3, 2024), https://medium.com/demohub-tutorials/googles-new-notebooklm-here-s-what-you-need-to-know-4411c3f5cd0c.

[7] Zalán Borsos et al., *AudioLM: A Language Modeling Approach to Audio Generation* (Sep. 7, 2022), https://arxiv.org/abs/2209.03143.

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capture streams of radio, podcasts, and/or audiobooks drive Mr. Greene's conclusion, as here

now alleged, that voice data matching his voice was ingested and processed for use in

AudioLM.[8] Furthermore, Google not only sought to imitate the same in its outputs but also

implemented no mitigations, filters, or other mechanisms to prevent outputs based on,

imitating, or referencing the same.

41.   In September 2024, *NotebookLM* introduced "Audio Overviews," a new

feature that enables users to turn documents into engaging audio discussions. With one click,

two AI hosts initiate a lively "deep dive" discussion based on the provided sources.

NotebookLM summarizes the material, makes connections between topics, and engages in

back-and-forth banter. The software also allows users to download conversations and take

them on the go. Millions of users have now adopted *NotebookLM*.[9]

42.   As Google continued to refine its product, it relied on its *AudioLM* technology

to identify a voice that could function as a consistent and default host. Among the available

options, Mr. Greene's voice was selected as, and remains, the default as of the filing of this

complaint, a choice designed to create familiarity for seasoned podcast listeners and, in effect,

maximize Google's profits. According to *ElevenLabs*, one of the creators behind *NotebookLM*,

the male "AI host" is instead referred to as "Charlie."[10] Yet, this voice exhibits the same sound,

tone, cadence, and mannerisms as Mr. Greene.

43.   In May 2025, Google unveiled new capabilities coming to *NotebookLM* at

"Google I/O," Google's largest developer conference of the year. Most notably, the company

announced the launch of "Video Overviews," a feature that enables users to create podcasts

with AI-generated virtual hosts from documents they have shared with *NotebookLM*, such as

course readings or legal briefs. At the conference, Google announced that users will soon be

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[8] *See also* Sergio Gevatschnaider, *Transforming Text into Podcasts with NotebookLM*, MEDIUM (Dec. 2, 2024), https://medium.com/@sergiosear/transforming-text-into-podcasts-with-NotebookLM-5dade83bdcca.

[9] Jagmeet Singh, *Google Expands NotebookLM Plus to Individual Users*, TECHCRUNCH (Feb. 10, 2025), https://techcrunch.com/2025/02/10/google-expands-notebooklm-plus-to-individual-users/.

[10] *How NotebookLM Was Made*, LATENT SPACE (Oct. 25, 2024), https://www.latent.space/p/notebooklm.

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able to convert dense multimedia, such as raw notes, PDFs, and images, into digestible visual presentations.

44.   On June 30, 2025, a leaked internal memo from Google was posted by a user on X (formerly Twitter).[11] The memo announced that *NotebookLM* would incorporate upgrades to its Audio Overviews feature, enabling users to produce multiple artifacts in different languages within the same notebook – a previously limited workflow. This change is specifically designed to cater to multilingual teams, researchers, and educators. The "Artifact Sharing" feature was designed to enable users to generate shareable links for Audio Overviews and Mind Maps, aiming to make *NotebookLM* a more collaborative platform.

45.   Google also released a version of *NotebookLM* that offers compatibility with Android and iOS devices, such as phones and tablets. Until then, *NotebookLM* had been accessible only on desktop computers.

46.   Subscribers can now access all these features with the Google One AI Premium tier, which costs $19.99 a month. Additionally, Google has introduced a free one-year Pro Plan for students aged eighteen and above in the United States.

47.   According to *TechCrunch*, "Google has not disclosed the actual number of users on *NotebookLM* nor the size of its team, only saying that it's grown over time. However, data from market intelligence provider *Similarweb* suggests the AI assistant [*NotebookLM*] has seen 28.18 million visits in the last three months [since February 2025], with almost 9 million in January alone."[12] Following *NotebookLM*'s integration of over 80 languages to its Audio Overviews feature, Google reported that the number of Audio Overviews created each day doubled in just two weeks.[13] The number of users doubled again following the launch of

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[11] Mahnoor Faisal, *Internal Memo Reveals NotebookLM's Most Exciting Features Could Arrive Any Day Now*, VALNET PUBL'G GRP. (Jun. 25, 2025), https://www.xda-developers.com/internal-memo-leak-notebooklm-upcoming-features-timeline/.

[12] Jagmeet Singh, *Google Expands NotebookLM Plus to Individual Users*, TECHCRUNCH (Feb. 10, 2025), https://www.xda-developers.com/internal-memo-leak-notebooklm-upcoming-features-timeline.

[13] Chaim Gartenberg, *The inside story of building NotebookLM*, GOOGLE (July 29, 2025), https://blog.google/technology/ai/developing-notebooklm/.

NotebookLM's mobile app.[14]

48.   During Google's Q1 2025 earnings call, Google and Alphabet CEO Sundar Pichai stated that Google had surpassed 270 million paid subscriptions, with YouTube and Google One serving as key drivers. *NotebookLM* is included in Google One's AI Premium subscription.[15] Google's total revenue was $90.23 billion, representing a 12% increase.[16] Google Search and YouTube advertising, Subscriptions, Platforms and Devices, and Google Cloud each posted double-digit revenue growth (10%, or $77.3 billion), reflecting strong momentum across the company.

C. MISAPPROPRIATION AND IMITATION OF MR. GREENE'S LIKENESS.

49.   Mr. Greene is an award-winning journalist and New York Times best-selling author who hosted NPR's award-winning news program *Morning Edition* for nearly a decade. Prior to taking on this role in 2012, Mr. Greene was an NPR foreign correspondent based in Moscow, covering the region from Ukraine and the Baltics east to Siberia. He wrote the New York Times bestseller "Midnight in Siberia," capturing Russian life on a journey across the Trans-Siberian Railway.[17]

50.   Mr. Greene's voice is a unique instrument. His voice became familiar to NPR listeners during his four years covering the White House. Greene was an integral part of NPR's coverage of the historic 2008 election, reporting on Hillary Clinton's campaign from start to finish, and also examining how racial attitudes influenced voters' decisions. The White House Correspondents' Association took special note of Greene's report on a speech by then-candidate Barack Obama addressing the nation's racial divide. Greene was given the

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[14] Biao Wang, *Understand Anything, Anywhere with the New NotebookLM App*, GOOGLE (May 19, 2025), https://blog.google/technology/ai/notebooklm-app/.
[15] *A Message from Our CEO: Q1 2025 Earnings*, GOOGLE (Apr. 24, 2025), https://blog.google/inside-google/message-ceo/alphabet-earnings-q1-2025/#introduction.
[16] *Alphabet Announces First Quarter 2025 Results*, S.E.C. (Apr. 24, 2025), https://www.sec.gov/Archives/edgar/data/1652044/000165204425000040/googexhibit991q12025.htm.
[17] *David Greene*, NPR (n.d.), https://www.npr.org/people/4510160/david-greene (archived at https://web.archive.org/web/20201228225135/https://www.npr.org/people/4510160/david-greene).

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1 Association's 2008 Merriman Smith Award for deadline coverage of the presidency.[18]

2   51.   Mr. Greene also hosted NPR's popular morning news podcast, *Up First*,

3 guiding listeners through turbulent elections, a world-altering pandemic, and ongoing

4 struggles for social change in the United States. Mr. Greene stepped away from Morning

5 Edition in 2021 and co-founded a new company, Fearless Media. Through Fearless Media,

6 Mr. Greene partnered with KCRW, NPR's flagship member station in Southern California, to

7 become the new host of *Left, Right & Center*, a renowned radio show and hour-long podcast

8 that brings together thought leaders across the political spectrum to discuss the week's top

9 news and issues. More recently, Mr. Greene's show, "Sports in America" was nominated for

10 "Best Sports Podcast" at the 2026 Ambie Awards, the highest recognition in the industry.

11 With rare exception, Mr. Greene reserves the exploitation of his likeness and the goodwill

12 associated therewith for his entertainment-related projects and for business ventures in which

13 he is personally involved.

14   52.   When one accesses the link https://*NotebookLM*.google.com/ in the online

15 search bar, it takes the consumer to Google's website, encouraging consumers to upload their

16 files, including PDFs, text files, websites, MP3s, YouTube video links, and copied text. The

17 podcast is then generated and features two "AI hosts": one male and one female voice.[19]

18 Exhibits 3, 4, 5, and 6 are audio samples illustrating comparisons between original sound clips

19 from Mr. Greene's *Left, Right, and Center* episodes and the audio outputs generated by

20 *NotebookLM*.[20] These exhibits will be provided on a flash drive and manually filed pursuant

21 to California Rules of Court § 8.74(a)(6)(B). They are also available at the permalinks

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[18] *A New Chapter for David Greene,* NPR (Oct. 1, 2020), https://www.npr.org/sections/npr-extra/2020/10/01/919052861/a-new-chapter-for-david-greene.

[19] A recent product update at Google's 2025 I/O Conference revealed that users now have the option to change the voice output into other languages. However, Mr. Greene's voice remains the default voice option.

[20] Specifically, Exhibits 3 and 4 are original excerpts from David Greene's episodes titled *"Why was passing the 'Big Beautiful Bill' so ugly for Republicans?"* (dated July 4, 2025) and *"Voters push back on Trump … in Canada"* (dated May 2, 2025). Exhibits 5 and 6 are *NotebookLM's* audio summaries based on these uploaded excerpts.

below.[21]

53.   On or around December 2024, Google announced a partnership with music streaming service Spotify to integrate *NotebookLM* into its annual "Spotify Wrapped" feature. Spotify Wrapped gives listeners a chance to look back at the artist and track connections they've made over the course of the year through their personalized "Wrapped" list, while also exploring some of the songs and artists that helped define the year in music culture more broadly through their editorial end-of-year Wrapped playlists. This feature is available to users in English across the U.S., the U.K., Australia, New Zealand, Canada, Ireland, and Sweden.[22]

54.   The "Spotify Wrapped" AI podcast features the same two "AI hosts" from *NotebookLM* gives listeners a chance to look back at the artist and track connections they've made over the course of the year through their personalized "Wrapped" list while also exploring some of the songs and artists that helped define the year in music culture more broadly through Spotify's editorial end-of-year Wrapped playlists.[23] Following its campaign, Spotify reported a 40% increase in app engagement, up from a 37% increase in 2023 and 32% in 2022.[24] Spotify also broke previous records for user interactions, with 10.5 million users sharing their summaries directly from the app, up from 9 million in 2023 and 7 million in 2022.[25] Google, therefore, leveraged Mr. Greene's voice in order to achieve greater financial

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[21] **Exhibit 3**: Left, Right & Center (Podcast Clip) – "Did the 'Big Beautiful Bill' kill compromise in Washington":
https://perma.cc/488X-K56X
Exhibit 4: Left, Right & Center (Podcast Clip) – "Voters push back on Trump … in Canada":
https://perma.cc/U645-H7PG
Exhibit 5: NotebookLM (Summary of LRC) – "Did the 'Big Beautiful Bill' kill compromise in Washington":
https://perma.cc/FL2L-UCLS
Exhibit 6: NotebookLM (Summary of LRC) – "Voters push back on Trump … in Canada":
https://perma.cc/X8VQ-MDUU
[22] Umar Shakir, *Spotify Wrapped 2024 Adds an AI Podcast to Recap Your Listening Habits*, THE VERGE (Dec. 4, 2024), https://www.theverge.com/2024/12/4/24312282/spotify-wrapped-2024-ai-podcast-recap-listening-habits.
[23] Spotify, *The Art and Science Behind Spotify Wrapped*, SPOTIFY NEWSROOM (Dec. 4, 2024), https://newsroom.spotify.com/2024-12-04/the-art-and-science-behind-spotify-wrapped.
[24] Josiah Du Fault, *Spotify Wrapped 2024: A Success or Failure? Engagement, Truth, and the Quest for Authenticity*, LINKEDIN (Dec. 8, 2024), https://www.linkedin.com/pulse/spotify-wrapped-2024-success-failure-engagement-truth-josiah-du-fault-tfh6c/.
[25] *Id.*

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success for itself and its partners without compensating him.

55. Despite Google's recent successes and praise for its innovation with *NotebookLM*, Google never approached Mr. Greene regarding the use of his voice, nor did Mr. Greene provide consent following the discovery that one of the "AI hosts" had mimicked his voice, inflection, and mannerisms.

56. Mr. Greene learned that Google had created and promoted videos about *NotebookLM* that featured Mr. Greene's AI-replicated voice. To be clear: Mr. Greene never recorded the YouTube videos; they were generated by then-unidentified AI software without Mr. Greene's participation or approval.

57. Instead, Mr. Greene discovered that his voice was being used based on communications shared by several prominent journalists in the industry and users who experimented with the Spotify Wrapped AI podcast. *See, e.g.*, Exhibit 1.

58. To confirm this, Mr. Greene consulted an independent forensic software company specializing in voice recognition. The platform scans the internet daily, searching for deepfakes, impersonations, and other unauthorized, misleading content. Users have the choice to automate takedowns or manage them individually. The company claims that users of its auto-takedown functionality saw a 95% takedown rate within 17 hours.

59. The company conducted a thorough analysis of the voice similarity between Mr. Greene's voice and the voice used in *NotebookLM*. The tests indicated a confidence rating of 53-60% (on a -100% to 100% scale) that Mr. Greene's voice was used to train the software driving NotebookLM. The company pulled a variety of recordings from Mr. Greene's show, *Left, Right, and Center*, as well as his previous stint on *Morning Edition*. On the company's proprietary scale, any confidence score that is above 50% is deemed "relatively high" evidence that the samples originate from the same speaker. To ensure that the AI voice was not explicitly tuned to NPR voices, the company compared the cosine similarity between other NPR hosts and the male "AI host." They found that there was little to no similarity between the male voice and the voices of other NPR hosts (*see* Exhibit 2). The CEO of the independent forensic software company concluded, "Given our experience

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with these voice recognition models, it's our confident opinion that the Google Podcast model was trained on DAVID GREENE's voice."

60.   An additional comparison of audio exhibits was conducted following Google's latest product updates to *NotebookLM*. Specifically, Exhibits 3 and 4 are original excerpts from David Greene's episodes from *Left, Right, and Center* titled *"Why was passing the 'Big Beautiful Bill' so ugly for Republicans?"* (dated July 4, 2025) and *"Voters push back on Trump … in Canada"* (dated May 2, 2025). These exhibits were uploaded to a notebook on *NotebookLM* for the purposes of having the male AI host "Charlie" discuss the audio exhibits in the podcast format for which *NotebookLM* is intended. Exhibits 5 and 6 are *NotebookLM's* audio summaries based on these uploaded excerpts.

61.   The voice of the male AI host was (and still is) unquestionably Mr. Greene's voice. To be clear, Google never stated that the AI host was Mr. Greene. Instead, Google did something even more insidious: it created a fake character (under the alias "Charlie") and imitated Mr. Greene's voice. Given Mr. Greene's distinguished history as a radio broadcaster, this cannot be coincidental or accidental. Google thus willfully and effectively stole Mr. Greene's voice—his protected property—and marketed and sold it as if it were its own without just or any compensation.

62.   Several media websites have tested and provided reviews of their experiences using *NotebookLM*, with many comparing the "AI host" to Mr. Greene's voice. For example, *WIT,* a news and events platform focused on travel technology, distribution, and marketing, reviewed *NotebookLM* by stating the following[26]:

> "Google's new AI tool, NotebookLM, has the tech world buzzing for good
> reason. Users of the platform can feed it with any sort of raw data in the form
> of a text document or PDF, from simple short stories to staggering reports on
> complicated subjects, and NotebookLM will turn it into a podcast. The results?

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[26] Arvindh Yuvaraj, *These Podcasters Aren't Real: Our AI Experiment with Google's NotebookLM*, WEB IN TRAVEL (Jan. 10, 2024), https://www.webintravel.com/these-podcasters-arent-real-our-ai-experiment-with-googles-notebook-lm.

Well, they range from impressive to exciting to frightening. The "podcast",

hosted by the same male and female voices every time, has the flow and

cadence of your typical NPR explainer, with "uhms", "aahs" and other human-

sounding crutch words organically (term used loosely) baked in. After a few

"episodes", it's easy to pick up how NotebookLM structures the podcast;

there's a pattern to how data is broken down and delivered, and every so often,

you'll hear a glitch in someone's voice, or the "hosts" will repeat entire

explanations."

63.   Another publication, the *Poynter Institute*, reviewed *NotebookLM* and

described the product as follows[27] (emphasis added):

"Now, I fed the bot the audio interviews I did in Spanish with some of the

children and their parents, along with background readings. In minutes, it spit

out a dialogue between two voices in English — one that sounded ***eerily like***

former 'Morning Edition' host David Greene and the other an indeterminate

female voice. Their enthusiasm rivaled the banality of their observations. "It's

wild! This town is trying to hold on to its roots, while also embracing, like, the

21st century!" the David Greene imposter said, adding that a ritual that "seems

so small on the surface, opens up this huge conversation, well, about

everything, really!"

64.   This is as Google intended, as Google has said of its product: "Think of it like

slipping the AI hosts a quick note right before they go on the air, which will change how they

cover your material."[28]

65.   Google took, copied, or otherwise imitated recordings of Mr. Greene's

distinctive, marketable, and widely recognizable voice and used data it obtained from doing

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[27] Samuel Stewart, *NotebookLM: Google Turns Documents Into "Podcast" – A Deep-Dive*, POYNTER (Oct. 7, 2024), https://www.poynter.org/commentary/2024/*NotebookLM*-google-turn-documents-into-podcast-deep-dive.

[28] Jason Spielman & Oliver King, *New in NotebookLM: Customizing your Audio Overviews and introducing NotebookLM Business*, GOOGLE (Oct. 17, 2024), https://blog.google/technology/ai/notebooklm-update-october-2024/.

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so to train its voice model that ultimately became known as "Charlie." Mr. Greene's decades-

long radio and podcasting career provided clear datasets that trained Google's voice model on

normal speech, as well as on different emotions (neutral, happy, serious, etc.), speeds, and

tones. Once trained using Mr. Greene's voice, "Charlie" can then take new texts and convert

them into speech, with output audio calibrated to replicate Mr. Greene's unique vocal

qualities, cadence, tone, pitch, and expressive style. But regardless of the precise technical

means used, Google deliberately made "Charlie" to sound so substantially similar to Mr.

Greene's voice that ordinary listeners reasonably believed the voice to be Mr. Greene's.

66.   Google undertook these actions with knowledge of Mr. Greene's vocal

recognizability, and with the intent to confuse, mislead, and capitalize on the commercial

value of Mr. Greene's identity and persona, resulting in actual confusion among users and the

unauthorized exploitation of Mr. Greene's voice and persona.

67.   As a result of Google's actions, Mr. Greene has had his attention diverted away

from work necessary to release future creative projects. Mr. Greene is understandably

concerned that any new work prominently featuring his likeness may be unlawfully replicated

or misappropriated by Google. This concern is well-founded, as AI-generated podcasts that

imitate his voice directly compete with his authentic work, undermining its value and

diminishing the unique commercial appeal of his personal identity. Two projects are

particularly at risk:

- "Sports in America with David Greene," a weekly podcast featuring in-
  depth interviews with athletes, coaches, and other figures in sports. The
  program focuses on the personal stories and relationships that shape their
  careers and create lasting moments for fans. The show is produced by
  public radio station WHYY and distributed by nonprofit media company
  PRX, reaching 99 radio stations in just four months. Its popularity has
  earned an Ambie Award nomination for "Best Sports Podcast" at the 2026

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Ambie Awards, the highest recognition in the industry.[29]

- "David Greene is Obsessed," a weekly podcast that invites celebrity guests to explore a range of topics, from light-hearted to deeply serious. The show is produced and distributed by Campside Media.

68.   Both shows reflect Mr. Greene's editorial style, journalistic voice, and creative expression. The delay in launching these projects was caused by the diversion of his time, money, and resources from production to investigating Google's unlawful use of his voice without consent. Public accessibility does not equate to unrestricted commercial use, particularly where such use creates a competing product that undermines the original creator's work.

69.   As a result of Google's actions, Mr. Greene has suffered economic harm relating to the loss of future licensing opportunities. By exploiting Mr. Greene's voice without consent, Google created a false and irreversible association between Mr. Greene's distinctive voice and *NotebookLM*. This false association diminishes the value of Mr. Greene's voice as a licensable asset and directly undermines Mr. Greene's ability to enter into future licensing agreements with third parties who might have otherwise sought legitimate licensing of Mr. Greene's voice and likeness, but now refrains from doing so to avoid confusion, reputational risk, or conflicts arising from Mr. Greene's perceived association with Google.

70.   There is a critical and legally significant difference between content made available for the public to hear and allowing that content to be harvested for commercial AI development. When Google uses public content to power an AI that mimics Mr. Greene's voice or replicates his show formats, it, among other things, robs Mr. Greene of his personal right of publicity. This misuse also creates a chilling effect on future creative activity by depriving creators of control over their own identity and original work.

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[29] Todd Spangler, *Ambies 2026 Podcast Awards Nominations: Full List*, VARIETY (Jan. 21, 2026), https://variety.com/2026/digital/news/ambies-2026-podcast-awards-nominations-full-list-1236637055/.

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71. This conduct directly violates Mr. Greene's right of publicity by creating a digital replica that imitates a core attribute of his identity, his distinctive voice, and turning it into a reusable asset for Google's commercial gain. It also threatens the future of creative work: if journalists, artists, and commentators know their voices can be cloned, automated, and monetized by third parties without consent or compensation, they have less incentive to invest in their own careers and develop a recognizable professional persona. By contrast, companies like Speechify have already recognized that AI audio products require real licensing agreements. They negotiate with public figures for the use of their voices and contract for the creation of "AI voices" that mirror those individuals. Google's strategy is to sidestep this established practice and reap the same commercial benefits while avoiding the costs and obligations of licensing, thereby unfairly shifting value away from the human creator and toward the infringer.

72. In sum, Google's misappropriation of Mr. Greene's voice deprived him of any share in the revenues generated from *NotebookLM* and left him less able to compete in the broadcasting market against a product that unlawfully exploits his own voice. This conduct constitutes unfair business acts and practices, as Google used Mr. Greene's voice without authorization to create and promote a competing product derived from his works.

VI.   CLAIMS FOR RELIEF

COUNT ONE: VIOLATION OF CALIFORNIA'S STATUTORY RIGHT OF PUBLICITY, CAL. CIV. CODE § 3344

1. Mr. Greene incorporates by reference all prior and subsequent allegations as though fully set forth herein.

2. As evidenced in part by the Google products referenced herein, Google used Mr. Greene's voice and/or likeness on and in direct connection with the launch of *NotebookLM*, resulting in a commercial benefit to Google. Mr. Greene never consented to this use by Google.

3. Google used Mr. Greene's voice in and for advertising and sales promotion by configuring a Greene-like voice as a default selling feature of NotebookLM, using the same in

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product demos and promotional blog posts, and integrating the same hosts into commercial partnerships like Spotify Wrapped, thereby creating a direct commercial connection within the meaning of California Civil Code § 3344.

4.   The alleged uses are not exempt as news or public affairs because the gravamen of the claim is Google's use of Mr. Greene's persona to market and sell its AI product and subscription access, rather than inclusion in an expressive work about matters of public interest. The product's "AI hosts" and their voices are positioned and used as a commercial feature to drive adoption.

5.   Google had longstanding knowledge that it did not and has never had the right to use these rights to design, manufacture, distribute, and sell Mr. Greene's voice and/or likeness. As one of the largest companies in the AI space, Google is undoubtedly familiar with Mr. Greene's rights to his voice and/or likeness. Despite that knowledge, Google created a digital replica of Mr. Greene's voice to enhance the audio output of its product, *NotebookLM*.

6.   Google's use of Mr. Greene's voice can and does confuse listeners, and damages Mr. Greene's reputation and prospective work, bearing his publicity rights, diluting the market and demand for Mr. Greene's future employment, and diminishing his ability to control the value of his voice and work. This misappropriation diminishes Mr. Greene's goodwill and future ability to generate earnings through the use of his voice and likeness.

COUNT TWO: UNFAIR COMPETITION, CAL. BUS & PROF. CODE § 17200

7.   Mr. Greene incorporates by reference all prior and subsequent allegations as though fully set forth herein.

8.   California's Unfair Competition Law ("UCL"), as codified in California Business & Professions Code § 17200, et seq., prohibits any unlawful, unfair, and/or fraudulent business act or practice.

9.   Through the above-described conduct, Google engaged in unlawful business acts or practices.

10.   Through the above-described, Google engaged in unfair business acts or

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1 | practices.

2 | 11. Through the above-described conduct, including but not limited to any

3 | representation that it trained on "publicly available" sources, Google engaged in fraudulent

4 | and/or deceptive business acts or practices. Further, through the above-described conduct,

5 | including public-facing representations about NotebookLM's outputs and generalized

6 | statements about training on "publicly available" data without disclosure that the male AI host

7 | voice was engineered to imitate Mr. Greene's distinctive voice, Google engaged in fraudulent

8 | and/or deceptive practices likely to mislead reasonable consumers about the provenance of the

9 | host voices. These statements appeared in Google's product pages and official blog posts

10 | describing Audio Overviews and the "AI hosts," which positioned the voices as a feature

11 | while omitting material facts about their imitation of Mr. Greene.

12 | 12. As a direct result of such acts and practices, Google received ill-gotten gains

13 | that rightfully belonged to Mr. Greene. Mr. Greene, therefore, has suffered injury in fact and

14 | has lost money or property.

15 | **COUNT THREE: COMMON LAW RIGHT OF PUBLICITY**

16 | 1. Mr. Greene incorporates by reference all prior and subsequent allegations as

17 | though fully set forth herein.

18 | 2. Google intentionally appropriated and exploited a core attribute of Mr.

19 | Greene's identity—his distinctive voice—by creating and deploying a synthetic voice preset

20 | substantially similar to Mr. Greene's voice, such that ordinary listeners reasonably believed

21 | the AI host to be Mr. Greene or associated with him.

22 | 3. Google's appropriation was made without consent and for commercial

23 | advantage, including to advertise and sell access to NotebookLM and to promote product tie-

24 | ins, causing injury to Mr. Greene, including interference with prospective economic

25 | advantage and diminution of the market for his services.

26 | **COUNT FOUR: QUASI-CONTRACT / UNJUST ENRICHMENT**

27 | 1. Mr. Greene incorporates by reference all prior and subsequent allegations as

28 | though fully set forth herein.

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2.   Defendants received a benefit from Mr. Greene by appropriating and exploiting the commercial value of Mr. Greene's distinctive voice and persona to develop, promote, and sell NotebookLM access, including through Google One AI Premium subscriptions.

3.   Defendants unjustly retained this benefit without compensating Mr. Greene and under circumstances that make it unjust for Defendants to retain the benefit.

4.   Mr. Greene seeks restitution and disgorgement of all amounts by which Defendants were unjustly enriched.

VII.   PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1.   For judgment in favor of Plaintiff against Defendants;

2.   For a declaration that such infringement is willful;

3.   For an award of actual, statutory, and punitive damages, as allowed by law or as elected by Mr. Greene, including statutory damages per incident of use of his voice (i.e., per generated podcast);

4.   For general damages (in an amount to be proven at trial);

5.   For special damages (in an amount to be proven at trial);

6.   For consequential and incidental damages (in an amount to be proven at trial);

7.   For permanent injunctive relief, including but not limited to the deletion of data acquired from or related to Mr. Greene and the immediate cessation of all products and services relying upon the same;

8.   For the costs of this action and reasonable attorneys' fees;

9.   For pre- and post-judgment interest on the damages awarded to Mr. Greene, and that such interest be awarded at the highest legal rate from and after the date this complaint is first served on Defendants; and

10.   For further relief for Mr. Greene as may be just and proper, including, but not limited to, disgorgement, both restitutionary and non-restitutionary.

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VIII. JURY TRIAL DEMANDED

Plaintiffs demand a trial by jury of all the claims asserted in this Complaint so triable.

Dated: January 23, 2026   Respectfully Submitted,

BOIES SCHILLER FLEXNER LLP

_s/ Mark C. Mao_____
Mark C. Mao

_s/ Joshua Michelangelo Stein_____
Joshua Michelangelo Stein

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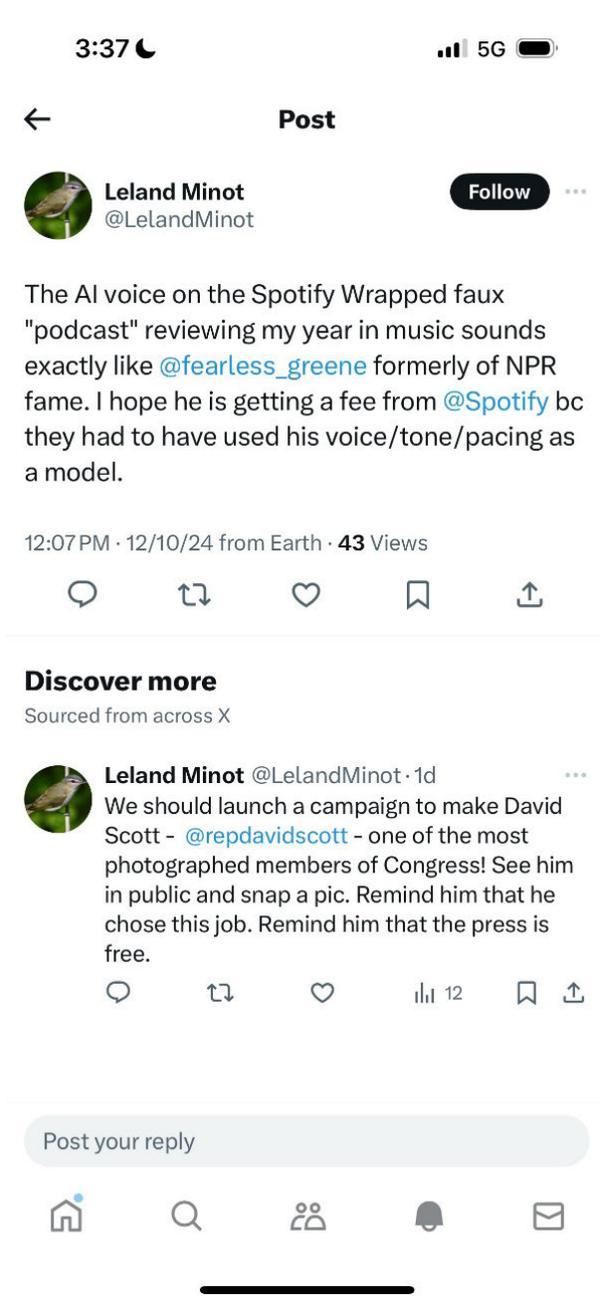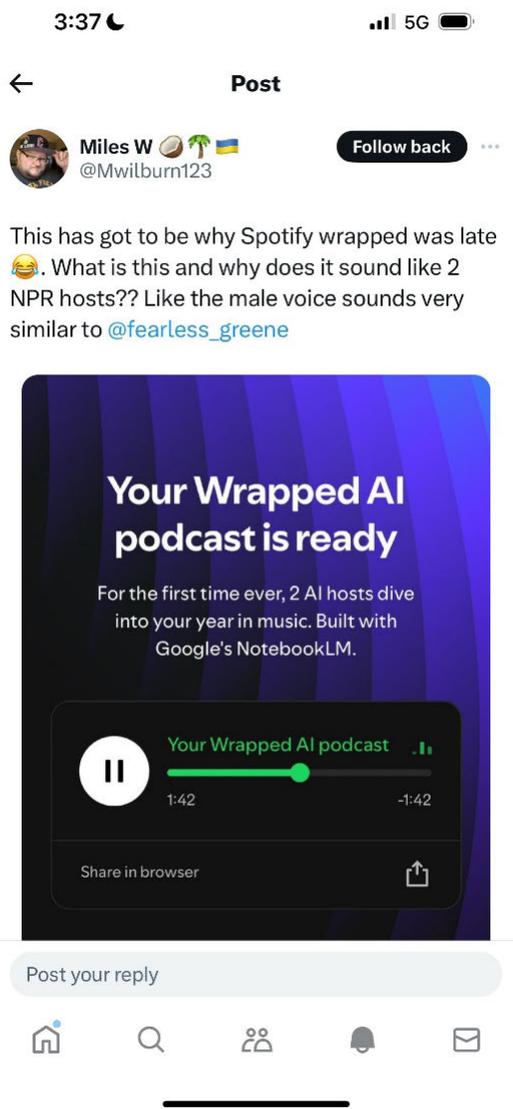jstein@bsfllp.com
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EXHIBIT 1 TO THE DAVID GREENE COMPLAINT
Social Media Posts from Users Comparing the Voice of "Charlie" to Mr. Greene's

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COMPLAINT

Exhibit 1: Social Media Posts from Users Comparing the Voice of "Charlie" to Mr. Greene's.

3:37 · 5G

Post

Miles W 🥥🌴🇺🇦 [Follow back] ···
@Mwilburn123

This has got to be why Spotify wrapped was late 😂. What is this and why does it sound like 2 NPR hosts?? Like the male voice sounds very similar to @fearless_greene

Your Wrapped AI podcast is ready

For the first time ever, 2 AI hosts dive into your year in music. Built with Google's NotebookLM.

Your Wrapped AI podcast
1:42   -1:42

Share in browser

Post your reply

3:37 · 5G

Post

Leland Minot [Follow] ···
@LelandMinot

The AI voice on the Spotify Wrapped faux "podcast" reviewing my year in music sounds exactly like @fearless_greene formerly of NPR fame. I hope he is getting a fee from @Spotify bc they had to have used his voice/tone/pacing as a model.

12:07 PM · 12/10/24 from Earth · **43** Views

Discover more
Sourced from across X

Leland Minot @LelandMinot · 1d ···
We should launch a campaign to make David Scott - @repdavidscott - one of the most photographed members of Congress! See him in public and snap a pic. Remind him that he chose this job. Remind him that the press is free.
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Post your reply

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EXHIBIT 2 TO THE DAVID GREENE COMPLAINT
Results of Independent Software Company's Digital Forensic Analysis on Google's Use of Mr. Greene's Voice and/or Likeness.

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COMPLAINT

Exhibit 2: Results of Independent Software Company's Digital Forensic Analysis on Google's Use of Mr. Greene's Voice and/or Likeness.

From: ██████ <███@███.com>
Subject: DAVID GREENE - Google Podcast Analysis
Date: October 29, 2024 at 1:06:09 AM EDT
To: Howard Yoon <hyoon@wmeagency.com>, Alicia Glekas Everett
<aeverett@wmeagency.com>, dlgreene023@gmail.com

David, Howard, Alicia,

We have completed a thorough analysis of the voice similarity between DAVID
GREENE's voice and the Google podcast voice using several models. Below are
the details of the findings

Summary of Findings:
  David Greene vs. Google Podcast:
  - weSpeaker ResNet-34: 0.6101
  - ███ model: 0.5676
  - NVIDIA TitaNet-Large: 0.6000
  - SpeechBrain: 0.5300

These results indicate a confidence of 53-60% that DAVID GREENE's voice was
used to train the Google AI model. When the confidence exceeds 50%, we
consider the probability of being the same person's voice relatively high. The
range is from -100% to 100%

Control Comparison:
To ensure that the AI voice was not specifically tuned to NPR voices, we
compared the cosine similarity between other NPR hosts and the Google
NotebookML voice

1. **Gene Demby:**
   - "Spitting on Andrew Jackson's Grave" - 0.0807
   - "Two Palestinian Writers" - 0.1369
   - "Haitian immigrants" - 0.0990
2. **A. Martinez:**
   - "Stanley Tucci Shares Insights" - 0.3500
   - "Tias and Primas" - 0.2785
3. **Adrian MA:**
   - "Election 2024" - 0.1554
   - "Rebranding Private Army" - 0.1498
4. **Darian Woods:**
   - "Fed Cuts Interest Rates" - 0.0627
   - "Pharmacy Benefit Managers" - 0.1096
5. **Female Podcasters vs. Google NotebookML (Female Voice):**

   - Transcripts - 0.2125
6. **BA. Parker:**
   - Transcripts - -0.0402 and -0.0370
7. **Ayesha Rascoe:**
   - "Party of One" - 0.0776
   - "Ta-Nehisi Coates" - 0.1110

Additionally, we compared DAVID GREENE's voice with A. Martinez:
  - **Stanley Tucci vs. David Greene: 0.3400**
  - **Tias and Primas vs. David Greene: 0.2400**

Given our experience with these voice recognition models, it's our confident
opinion that the Google Podcast model was trained on DAVID GREENE's voice.

If there is any other data that is required, please let us know.

Thanks,

CEO, ███
LinkedIn

COMPLAINT

EXHIBIT 3 TO THE DAVID GREENE COMPLAINT

Left, Right & Center (Podcast Clip) – "Did the 'Big Beautiful Bill' kill compromise in

Washington":

https://perma.cc/488X-K56X

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11 **EXHIBIT 4 TO THE DAVID GREENE COMPLAINT**
12 **Left, Right & Center (Podcast Clip) – "Voters push back on Trump … in Canada":**
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14 **https://perma.cc/U645-H7PG**
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11 **EXHIBIT 5 TO THE DAVID GREENE COMPLAINT**

12 **NotebookLM (Summary of LRC) – "Did the 'Big Beautiful Bill' kill compromise in**

13 **Washington":**

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15 **https://perma.cc/FL2L-UCLS**

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17 **AUDIO FILE FILED MANUALLY**

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EXHIBIT 6 TO THE DAVID GREENE COMPLAINT

NotebookLM (Summary of LRC) – "Voters push back on Trump … in Canada":

https://perma.cc/X8VQ-MDUU

AUDIO FILE FILED MANUALLY

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