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**THE COPYRIGHT CONUNDRUM: EXPLORING THE LEGAL CHALLENGES TO THE  
COPYRIGHTABILITY OF AI-GENERATED WORKS AND THE FUTURE OF THE  
ENTERTAINMENT INDUSTRY**

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❖ Note ❖

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## I. INTRODUCTION

The Writers Guild of America (WGA) and Screen Actors Guild-American Federation of Television and Radio Artists (SAG-AFTRA) strikes of 2023 sparked major controversy over the use of generative artificial intelligence (AI) in the entertainment industry.<sup>1</sup> Writers have fears of AI being used to take over their script-writing jobs and reduce their bargaining power for pay.<sup>2</sup> Actors have fears of AI being used to replace the work of background actors and using their scanned body images posthumously without permission from the actor or the actor's estate.<sup>3</sup>

Amid these strikes, large entertainment conglomerates such as the Walt Disney Company continued to signal their interest in further implementing such technology into their businesses.<sup>4</sup> A recent survey of 300 entertainment industry executives conducted by CVL Economics found that generative AI systems have

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<sup>1</sup> See Andrew Dalton, *The Hollywood Writers Strike is Over After Guild Leaders Approve Contract with Studios*, THE ASSOCIATED PRESS (Sept. 26, 2023, 10:24 PM), <https://apnews.com/article/writers-strike-deal-hollywood-vote-actors-d3119d670a4fd3449773bf8f4026fb2b>; see also Megan Cerullo, *SAG-AFTRA Reaches Tentative Agreement with Hollywood Studios in a Move to End Nearly 4-Month Strike*, CBS NEWS (Nov. 9, 2023, 1:33 PM), <https://www.cbsnews.com/news/sag-aftra-strike-update-actors-2023/>.

<sup>2</sup> See Matt Scherer, *New WGA Labor Agreement Gives Hollywood Writers Important Protections in the Era of AI*, CTR. FOR DEMOCRACY AND TECH. (Oct. 17, 2023), <https://cdt.org/insights/new-wga-labor-agreement-gives-hollywood-writers-important-protections-in-the-era-of-ai/>.

<sup>3</sup> See Matt Scherer, *The SAG-AFTRA Strike is Over, But the AI Fight in Hollywood is Just Beginning*, CTR. FOR DEMOCRACY AND TECH. (Jan. 4, 2024), <https://cdt.org/insights/the-sag-aftra-strike-is-over-but-the-ai-fight-in-hollywood-is-just-beginning/>.

<sup>4</sup> See Dawn Chmielewski & Krystal Hu, *Disney Creates Task Force to Explore AI and Cut Costs – Sources*, REUTERS (Aug. 10, 2023, 4:06 AM), <https://www.reuters.com/technology/disney-creates-task-force-explore-ai-cut-costs-sources-2023-08-08/>.

already been integrated into many companies and have increased efficiency in completing daily tasks.<sup>5</sup> However, the many possible uses of such tools in the entertainment industry will amount to nothing if the entertainment companies cannot copyright the AI-generated works.<sup>6</sup> Thus, the current landscape of copyright law as it relates to AI-generated works will have a great impact on the entertainment industry.

Part II of this note will discuss the background of generative AI and its use in the entertainment industry. Part III will analyze the current legal framework of AI-generated works and copyrightability as well as its implications for the entertainment industry. Finally, Part IV will recommend how entertainment companies should deal with the unknowns of copyright protection with AI-generated works.

## II. BACKGROUND

### *A. What is generative AI?*

The term “generative AI” describes machine learning systems that can “create new content including audio, code, images, text, simulations, and videos.”<sup>7</sup> Chatbots like ChatGPT and image generators like Midjourney are just a few examples of the numerous generative AI tools that are available today.<sup>8</sup> Although the use of AI is not brand new, it has been receiving considerably more attention lately due to rapid improvements in the quality of AI-generated products.<sup>9</sup>

### *B. How is generative AI used in the entertainment industry?*

As of January 2024, around twenty-five percent of creative businesses have a generative AI program already in place.<sup>10</sup> This number is expected to increase substantially, with forty-seven percent of those companies indicating that they are either planning on adopting or in the early stages of adopting an AI program.<sup>11</sup>

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<sup>5</sup> See CVL ECONOMICS, *FUTURE UNSCRIPTED: THE IMPACT OF GENERATIVE ARTIFICIAL INTELLIGENCE ON ENTERTAINMENT INDUSTRY JOBS* 5 (Jan. 2024), <https://animationguild.org/wp-content/uploads/2024/01/Future-Unscripted-The-Impact-of-Generative-Artificial-Intelligence-on-Entertainment-Industry-Jobs-pages-1.pdf>.

<sup>6</sup> See Julia Rittenberg & Kelly Main, *What is Copyright? Everything You Need to Know*, FORBES (Jun. 22, 2023, 9:03 AM), <https://www.forbes.com/advisor/business/what-is-copyright/>.

<sup>7</sup> *What is Generative AI?*, MCKINSEY & CO. (Apr. 2, 2024), <https://www.mckinsey.com/featured-insights/mckinsey-explainers/what-is-generative-ai>.

<sup>8</sup> Ellen Glover, *AI-Generated Content and Copyright Law: What We Know*, BUILT IN, <https://builtin.com/artificial-intelligence/ai-copyright> (last updated Feb. 28, 2024).

<sup>9</sup> See *Artificial Intelligence's Use and Rapid Growth Highlight Its Possibilities and Perils*, U.S. GOVERNMENTAL ACCOUNTABILITY OFF. (Sept. 6, 2023), <https://www.gao.gov/blog/artificial-intelligences-use-and-rapid-growth-highlight-its-possibilities-and-perils>.

<sup>10</sup> CVL ECONOMICS, *supra* note 5, at 5.

<sup>11</sup> *Id.*

Entertainment companies have already begun using generative AI in many ways such as by analyzing viewing data to personalize recommended content for streaming service users,<sup>12</sup> using AI chatbots in customer service, and improving 3D modeling of animated characters in film and television production.<sup>13</sup>

Studios and production companies are especially interested in AI technology in the creation of scripts, reviews, digital images, etc.<sup>14</sup> For example, the Walt Disney Company has been a large proponent of the use of AI in its entertainment development, creating a task force to research the possible uses of AI throughout its entire business.<sup>15</sup> And it seems that the early use of AI in films has been successful, as the Oscar-winning film “Everything, Everywhere, All at Once” used a generative AI system to remove background green screen.<sup>16</sup> However, there has been a substantial amount of opposition to the use of AI in the entertainment space.<sup>17</sup> In fact, the recent use of generative AI to create the opening sequence of the Disney+ television show *Secret Invasion* was met with public criticism of the ethical concerns of using AI as it premiered in the middle of the WGA strike.<sup>18</sup>

However, AI does have promising advantages in cost efficiency, convenience, and as a tool for problem solving in the entertainment field.<sup>19</sup> For example, Pixar recently used generative AI to improve upon an animation of fire—a notoriously challenging object to animate.<sup>20</sup> However, the use of AI was in conjunction with human illustrators and was only one tool at their disposal.<sup>21</sup> As many have rightly feared that creative jobs may be lost in the mass push for AI, the

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<sup>12</sup> See Julia McCoy, *Video: AI's Impact on The Economy & Entertainment Industry*, CONTENT AT SCALE (Feb. 28, 2024), <https://contentatscale.ai/blog/video-ai-impact-on-economy-and-entertainment/>.

<sup>13</sup> See Akash Takyar, *AI in Media and Entertainment: Use Cases, Benefits and Solution*, LEEWAYHERTZ, <https://www.leewayhertz.com/ai-in-media-and-entertainment> (last visited Apr. 11, 2024).

<sup>14</sup> See Thomas H. Davenport & Randy Bean, *The Impact of Generative AI on Hollywood and Entertainment*, MIT SLOAN MGMT. R. (Jun. 19, 2023), <https://sloanreview.mit.edu/article/the-impact-of-generative-ai-on-hollywood-and-entertainment/>.

<sup>15</sup> See Chmielewski & Hu, *supra* note 4.

<sup>16</sup> See Jennifer Kingson, *Runway Brings AI Movie-making to the Masses*, AXIOS (May 5, 2023), <https://www.axios.com/2023/05/05/runway-generative-ai-chatgpt-video>.

<sup>17</sup> See Brian Merchant, *The Writers' Strike was the First Workplace Battle Between Humans and AI. The Humans Won*, L.A. TIMES (Sept. 25, 2023, 3:20 PM), <https://www.latimes.com/business/technology/story/2023-09-25/column-sag-aftra-strike-writers-victory-humans-over-ai>.

<sup>18</sup> See Angela Watercutter, *Marvel's Secret Invasion AI Scandal is Strangely Hopeful*, WIRED (Jun. 23, 2023, 9:00 AM), <https://www.wired.com/story/marvel-secret-invasion-artificial-intelligence/>.

<sup>19</sup> See Nelson Granados, *Predicting the Pivotal Role of AI in Media and Entertainment*, FORBES (Nov. 6, 2023, 9:00 AM), <https://www.forbes.com/sites/nelsongranados/2023/11/06/predicting-the-pivotal-role-of-ai-in-media-and-entertainment/?sh=140913a610ca>.

<sup>20</sup> Marah Eakin, *Pixar Used AI to Stoke Elementals Flame*, WIRED (Jun. 16, 2023, 6:00 AM), <https://www.wired.com/story/pixar-elemental-artificial-intelligence-flames/>.

<sup>21</sup> See *id.*

WGA and SAG-AFTRA strikes pushed entertainment companies to agree to protections for writers and actors against the forced use of generative AI.<sup>22</sup>

### C. *WGA and SAG-AFTRA Strikes Concluded*

Following the conclusion of the WGA and SAG-AFTRA strikes in 2023, some parameters were put in place to regulate the use of generative AI in the industry, including that (1) companies cannot mandate that a writer uses generative AI; (2) materials produced by generative AI cannot be considered literary material<sup>23</sup>; and (3) the creation of digital replicas of actors requires consent.<sup>24</sup> Furthermore, the final WGA agreement states that companies can reject the use of generative AI when it threatens copyrightability.<sup>25</sup> However, many entertainment industry jobs remain unprotected from the threat of generative AI (e.g. sound editors, sound designers, graphic designers, 3D modelers, etc.).<sup>26</sup>

## III. ANALYSIS

### A. *Legal Challenges to Copyrightability of AI Generated Works*

There is currently no agreed-upon framework for how much human authorship is required in conjunction with generative AI for a work to be able to be registered with the US Copyright Office.<sup>27</sup> The Copyright Act of 1976 allows copyright protection to attach to “original works of authorship fixed in any tangible medium of expression.”<sup>28</sup> With AI-generated works, the “authorship” requirement is at issue.

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<sup>22</sup> See Brian Scheid, *Hollywood Strikes Highlight Potential Labor Force Turmoil Over AI to Come*, SPGLOBAL.COM (Dec. 5, 2023), <https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/hollywood-strikes-highlight-potential-labor-force-turmoil-over-ai-to-come-78820418>.

<sup>23</sup> See Vanessa Romain & Kailey Johnson, *AI Concerns of WGA and SAG-AFTRA: What is Allowed?*, AKIN GUMP STRAUSS HAUER & FELD LLP (Oct. 2, 2023), <https://www.akingump.com/en/insights/alerts/ai-concerns-of-wga-and-sag-aftra-what-is-allowed>.

<sup>24</sup> See Rebecca Klar, *SAG-AFTRA Releases Agreement, Details AI Protections*, THE HILL (Nov. 13, 2023, 2:25 PM), <https://thehill.com/policy/technology/4307400-sag-aftra-releases-agreement-details-ai-protections/>.

<sup>25</sup> Romain & Johnson, *supra* note 23.

<sup>26</sup> See CVL ECONOMICS, *supra* note 5, at 9.

<sup>27</sup> See Adam Lidgett, *Copyright Decision on AI-Generated Art Is Just the Beginning*, LAW360 (Aug. 23, 2023, 8:21 PM), <https://www.law360.com/articles/1714390/copyright-decision-on-ai-generated-art-is-just-the-beginning>.

<sup>28</sup> 17 U.S.C. § 102.

In *Thaler v. Perlmutter*, the court found that an AI-generated image was not copyrightable when the AI system was the sole creator of the image.<sup>29</sup> However, the decision only mused over the new legal issues that will likely need to be resolved as the judge acknowledged that there could conceivably be some combination of human and AI authorship that could qualify for copyright protection.<sup>30</sup> But the question remains of how much human authorship is required in combination with AI authorship before a work becomes copyrightable.

Currently, the answer to this question is unclear. A recent decision by the Copyright Office offers minimal guidance on this issue as the human author of a graphic novel entitled *Zarya of the Dawn* was granted copyright protection over the text that she wrote as well as the specific compilation of images.<sup>31</sup> However, the images themselves were not granted copyright protection due to being produced by an AI image-generator, and any edits the author made to the images were not considered to be substantial modifications.<sup>32</sup>

In another instance, a human author, Ankit Sahni, took a photograph of himself and uploaded it into a generative AI system. He then requested that the AI modify the photograph into the style of Vincent Van Gogh's *The Starry Night* and chose the variable value to which Van Gogh's style was applied in the final work.<sup>33</sup> Sahni had listed both himself and the generative AI system as authors when he submitted the copyright registration to the Copyright Office, but was listed as the only claimant for the copyright registration.<sup>34</sup> When the Copyright Office requested more information concerning his use of AI, Mr. Sahni submitted a comprehensive seventeen page summary detailing his use of the generative AI system.<sup>35</sup> The Copyright Office still denied the application because "human authorship cannot be distinguished or separated from the final work produced by the computer program."<sup>36</sup>

However, the Copyright Office has indicated that about 200 registrations have been accepted of the 1,000 copyright registration applications that have been received by the office and disclosed the use of generative AI in developing the

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<sup>29</sup> *Thaler v. Perlmutter*, Civil Action No. 22-15634, 2023 WL 5333236, at \*1 (D.D.C. Aug. 18, 2023).

<sup>30</sup> *Id.*

<sup>31</sup> Letter from U.S. Copyright Office Review Board to Van Lindberg Zarya of the Dawn (Registration # VAu001480196) (Feb. 21, 2023), <https://www.copyright.gov/docs/zarya-of-the-dawn.pdf>.

<sup>32</sup> *Id.*

<sup>33</sup> Letter from U.S. Copyright Office Review Board to Alex Garins, Second Request for Reconsideration for Refusal to Register SURYAST (SR # 1-11016599571; Correspondence ID: 1-5PR2XKJ) (Dec. 11, 2023), <https://www.copyright.gov/rulings-filings/review-board/docs/SURYAST.pdf>.

<sup>34</sup> *Id.*

<sup>35</sup> *Id.*

<sup>36</sup> *Id.*

work.<sup>37</sup> According to the Copyright Public Records Portal, many of the works that disclosed the use of AI and still were able to be accepted for copyright registration contain similar disclosure language.<sup>38</sup> For example, a novel that successfully gained a copyright registration disclosed its use of AI by stating that “[a]pproximately 60 to 80% of the writing is original and human-written,” while “[f]or the portions that are AI generated, nearly 100% of what was AI generated has been either revised, re-arranged, or re-written by a human writer.”<sup>39</sup>

By comparing the copyright registration outcomes, it seems that the Copyright Office is amenable to the use of generative AI in works as long as the AI is merely a tool to generate ideas and speed up the process of content creation.<sup>40</sup> However, the human author must continually revise and revisit any AI-generated content; merely inputting a creative work with a human author into an AI system and using that AI-generated output is not enough for copyright registration if the human author does not exert enough control over the final product.<sup>41</sup> The human author cannot become the tool for the AI, it must be the other way around.<sup>42</sup>

Currently, the Copyright Office also does not seem to be amenable to the idea that human creativity through the input of text prompts into an AI system will be sufficient to satisfy the human authorship requirement of copyright registration.<sup>43</sup> However, many more cases are likely to pop up that consider the very issue of when human control over the outputs of generative AI is so substantial that copyright protection should be granted.<sup>44</sup>

### B. *Entertainment Companies’ Concerns*

Companies want to churn out content and save money—goals that generative AI is poised to advance. According to Goldman Sachs, twenty-six percent

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<sup>37</sup> Isaiah Poritz, *AI Can Write the Lyrics, But Who Owns the Music is Up for Debate*, BLOOMBERG L. (Apr. 10, 2024, 4:01 AM), <https://www.bloomberglaw.com/product/blaw/bloomberglawnews/business-and-practice/BNA%200000018e-9f42-d148-a1ef-ff638dfe0001>.

<sup>38</sup> See *Let Her Go (A Fiona Red FBI Suspense Thriller--Book 1)*, U.S. COPYRIGHT OFF., <https://publicrecords.copyright.gov/detailed-record/35061402> (last visited Jul. 11, 2024).

<sup>39</sup> *Id.*

<sup>40</sup> See U.S. Copyright Office Review Board to Lindberg *supra* note 31; see also U.S. COPYRIGHT OFF., *supra* note 38.

<sup>41</sup> See U.S. Copyright Office Letter to Garins *supra* note 33.

<sup>42</sup> See *id.*; see also U.S. COPYRIGHT OFF., *supra* note 38.

<sup>43</sup> See Letter from U.S. Copyright Office Review Board to Tamara Pester, Second Request for Reconsideration for Refusal to Register Théâtre D’opéra Spatial (SR # 1-11743923581; Correspondence ID: 1-5T5320R) (Sept. 5, 2023), <https://www.copyright.gov/rulings-filings/review-board/docs/Theatre-Dopera-Spatial.pdf> (finding that an AI-generated image cannot be copyrighted even after a person inputted 694 text prompt revisions into the AI model to receive the image that he desired).

<sup>44</sup> See Glover, *supra* note 8.

of the arts, design, entertainment, sports, and media industry is exposed to automation by AI.<sup>45</sup> Another estimation by CVL Economics suggested that about 21.4% of jobs (or approximately 118,500 jobs) in the film, animation, and television industry can expect to be disrupted by the use of generative AI by 2026.<sup>46</sup> The use of AI in content creation is more cost effective for companies than employing humans to do that work.<sup>47</sup> For example, the co-founder of DreamWorks, Jeffrey Katzenberg, estimated that AI would accelerate the creation of an animated movie by a factor of ten.<sup>48</sup> However, should companies use too much AI as opposed to human authorship, the otherwise valuable creative works that have been created could fall into the public domain.<sup>49</sup> Should these works fall into the public domain, companies would lose protections of their works including the right to sue infringing individuals, collect monetary damages, and request injunctions against infringers.<sup>50</sup>

Because so much of the copyrightability of AI-human collaborations remains unresolved, copyright registrants may be tempted to not disclose any AI assistance that was used in the creation of a work.<sup>51</sup> Registrants may decide that the risk of losing copyright protection following disclosure of the use of AI—even if the use was somewhat minimal—is greater than the risk of de-registration later on if the use of AI came to light.<sup>52</sup> Scholars have even suggested that certain U.S. registrants are inclined to register their works in other countries that do recognize the copyrightability of AI-generated works. Such an approach would preserve their ability to file lawsuits against infringers in the U.S.<sup>53</sup>

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<sup>45</sup> Joseph Briggs & Devesh Kodnani, *The Potentially Large Effects of Artificial Intelligence on Economic Growth*, GOLDMAN SACHS (Mar. 26, 2023, 9:05 PM), [https://www.key4biz.it/wp-content/uploads/2023/03/Global-Economics-Analyst\\_-The-Potentially-Large-Effects-of-Artificial-Intelligence-on-Economic-Growth-Briggs\\_Kodnani.pdf](https://www.key4biz.it/wp-content/uploads/2023/03/Global-Economics-Analyst_-The-Potentially-Large-Effects-of-Artificial-Intelligence-on-Economic-Growth-Briggs_Kodnani.pdf).

<sup>46</sup> CVL ECONOMICS, *supra* note 5, at 9.

<sup>47</sup> See Angela Luna & Danielle Draper, *Hollywood Strikes Back Against Generative AI Disruption*, BIPARTISAN POL'Y CTR. (Dec. 3, 2023), <https://bipartisanpolicy.org/blog/hollywood-strikes-back-against-generative-ai-disruption/>.

<sup>48</sup> Saritha Rai, *AI Will Cut Cost of Animated Films by 90%*, Jeff Katzenberg Says, BLOOMBERG (Nov. 8, 2023, 11:15 PM), [bloomberg.com/news/articles/2023-11-09/ai-will-cut-cost-of-animated-films-by-90-jeff-katzenberg-says?embedded-checkout=true](https://www.bloomberg.com/news/articles/2023-11-09/ai-will-cut-cost-of-animated-films-by-90-jeff-katzenberg-says?embedded-checkout=true).

<sup>49</sup> See Schuyler Moore, *The Implications of AI Elements Not Being Protected By Copyright*, FORBES (Aug. 31, 2023, 4:13 PM), <https://www.forbes.com/sites/schuylermoore/2023/08/31/the-implications-of-ai-elements-not-being-protected-by-copyright/?sh=61a1f2b62c80>.

<sup>50</sup> See Rittenberg & Main, *supra* note 6.

<sup>51</sup> See Moore, *supra* note 49.

<sup>52</sup> See *id.*

<sup>53</sup> See Edward Lee, *The Code Red for Copyright Law*, 76 FLA. L. REV. (forthcoming 2024), <https://ssrn.com/abstract=4767791>.

## IV. RECOMMENDATION

Clear guidelines should be implemented by the US Copyright Office about the copyrightability of joint human and AI-created works. The current guidance is a “case-by-case” inquiry to decide whether the amount of AI use in the work bars copyright protection.<sup>54</sup> However, without examples of when copyright protection would be accepted with AI-assisted works, this standard is too broad and vague to truly regulate and provide predictable results for copyright protection.

The most recent guidance on AI-human collaboration in inventorship by the US Patent and Trademark Office (USPTO) offers some helpful suggestions for how to make this guidance clearer.<sup>55</sup> The USPTO described examples that may be considered significant contributions by a human in conjunction with AI-assisted inventions including “constructing an AI prompt in view of a specific problem to elicit a particular solution,” and “performing a successful experiment using output of an AI system.”<sup>56</sup> The Copyright Office should take note of the specifics that the USPTO included in its most recent guidance and strive to publish similarly clear examples of when human-AI collaborative works can be granted copyright protection.

For now, entertainment companies should remain cautious of the use of generative AI for the creation of products such as scripts, animations, advertisements, posters, etc. Generative AI can be relied upon as merely a tool in the creative process, but it should not be the substantial author of any work; otherwise, a company will become susceptible to losing copyright protection for its valuable works. Currently, generative AI is best used for optimizing the media supply chain through more data-driven analyses such as targeted advertising and audience preferences—leaving more creative endeavors to humans to reduce the risk of the loss of copyright protection.<sup>57</sup>

Furthermore, entertainment companies should start a concerted lobbying campaign to foster discussions about amending copyright laws. This effort can help protect them from the risk of losing copyright protection for valuable works assisted by AI. However, businesses should also recognize that other constituents (i.e., writers, actors, artists, etc.) must be considered during this change. Technological

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<sup>54</sup> Copyright Registration Guidance: Works Containing Material Generated by Artificial Intelligence, 88 Fed. Reg. 16192 (Mar. 16, 2023).

<sup>55</sup> See *USPTO Offers Guidance on Inventorship for AI-Human Collaborations*, COOLEY (Feb. 28, 2024), <https://www.cooley.com/news/insight/2024/2024-02-28-uspto-offers-guidance-on-inventorship-for-ai-human-collaborations>.

<sup>56</sup> *Id.* (quoting *Inventorship Guidance for AI-Assisted Inventions*, 89 Fed. Reg. 10048 (Feb. 13, 2024)).

<sup>57</sup> See Ryan Kido, *From AI to Z: Unleashing Artificial Intelligence’s Impact on the Global Entertainment Economy*, FORBES (Feb. 5, 2024, 8:15 AM), <https://www.forbes.com/sites/forbestechcouncil/2024/02/05/from-ai-to-z-unleashing-artificial-intelligences-impact-on-the-global-entertainment-economy/?sh=15552c9563fd>.



leaps have often been met with resistance by those whose livelihoods have been disrupted by them.<sup>58</sup> But to allow full copyright protection over a work that was made without substantial human intervention would be antithetical to the purpose of copyright: protecting peoples' work. The most equitable result seems to be a system that allows AI-generated works to be copyrighted, but human input must be substantial and creative. As leaders in the industry, especially having just gone through the historic WGA and SAG-AFTRA strikes, entertainment companies need to take a leadership role in pushing for a more comprehensive framework from the legislature over copyright and AI.

## V. CONCLUSION

In conclusion, while the future of copyright protection of AI-assisted works remains unknown, companies should be cautious of using AI in creative endeavors. Entertainment companies should be prepared to lobby Congress for more regulations and guidance concerning AI and copyright infringement as it pertains to the entertainment industry.

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<sup>58</sup> See Thomas Doherty, *The Last Time Actors and Writers Both Went on Strike: How Hollywood Ended the 1960 Crisis*, THE HOLLYWOOD REP. (Jul. 18, 2023, 6:45 AM), <https://www.hollywoodreporter.com/business/business-news/sag-wga-1960-hollywood-strike-reagan-history-1235538551/>.