Reconciling Authorship and Artificial Intelligence: A Human Contribution Framework

Pranal Siripurapu

Abstract

As the applications of artificial intelligence continue to burgeon across every industry, it has created a crisis in copyright law. AI challenges the foundational assumption that authorship is distinctly a human title. While courts have historically adapted to new creative technologies, the recent rejection of copyright claims in *Thaler v. Perlmutter* and the Ninth Circuit's ruling in *Naruto v. Slater* revealed a critical gap in the legal doctrine. Current U.S. law is unclear on what circumstances human and artificial intelligence collaboration satisfy the constitutional and statutory requirement of human-centered and originality. This paper argues that courts can and should recognize intellectual property rights for artificial intelligence assisted works that exhibit a spark of human creativity, without redefining authorship. It does this by taking account of historical precedence of seminal cases like *Burrow-Giles Lithographic Co. v. Sarony* and *Feist Publications, Inc. v. Rural Telephone Service Co*., and by comparing international approaches taken by China, the United Kingdom, and the European Union. The paper proposes a statutory Human Contribution test that requires three key elements, demonstrable creative direction, intellectual shaping of product, and an authorial intent to create said work. By clarifying the boundaries of authorship in AI-assisted work, this paper introduces a framework that resolves a pressing legal dilemma and ensures copyright law continues to incentivize human innovation, prevent market distortions, and fulfill its constitutional purpose to "promote the Progress of Science and useful Arts" in the age of artificial intelligence.

DOI: 10.5195/pur.2026.150

Introduction

In 2023, Doctor Stephen Thaler attempted to register intellectual property rights for *A Recent Entrance to Paradise,* a digital artwork generated by an artificial intelligence system he developed known as the Creativity Machine.[1] The U.S. Copyright Office rejected the application on the basis that the Copyright Act requires the work to have been authored by a human; the District of Columbia Circuit affirmed this decision on appeal.[2]

While the ruling, at first glance, appears to have drawn an unequivocal line between human and machines, it is more accurately read as a procedural edge case.[3] The Court's conclusion heavily relied on particular facts in the case and how Dr. Thaler filed his claim, which framed the machine as the sole author and allowed the court to avoid the more nuanced question of the possibility of collaboration between humans and artificial intelligence.[4]

Dr. Thaler's case highlights the importances of understanding how human and artificial intelligence partnerships affects copyright law is important, not only for courts but for policymakers, authors, and innovators.[5] As generative AI tools have become deeply embedded in the creative process, the law must now decide whether a human who demonstrates judgement over the output can fulfill the long-standing requirement of originality in the copyright law.[6] For the public, this decision will determine whether copyright will remain a system that incentivizes creativity or reshape the creative process by flooding the public domain with high-quality content, diminishing incentives for human creators to produce new works. For the public, this decision will determine whether copyright will remain a system that incentivizes creativity or reshape the creative process by flooding the public domain with high-quality content, diminishing incentives for human creators to produce new works. If AI-assisted works are categorically denied protection due to rigid authorship standards, such works would automatically enter the public domain upon creation, dramatically increasing the volume of freely usable content.[7]

In line with established historical precedent and the low originality threshold established by the Supreme Court in *Feist Publications, Inc. v. Rural Telephone Service Co.*, this paper argues that, courts can, and should, recognize human authorship for artificial intelligence works in which the human creator

[1] "US Court of Appeals for DC Denies Copyright Registration for Work Generated Solely by AI Author," Https://Www.Nortonrosefulbright.Com/En/Knowledge/Publications/Bfc31103/Us-Court-of-Appeals-for-Dc-Denies-Copyright-Registration-for-Work-Generated-Solely-by-Ai-Author, accessed September 23, 2025, https://www.nortonrosefulbright.com/en/knowledge/publications/bfc31103/us-court-of-appeals-for-dc-denies-copyright-registration-for-work-generated-solely-by-ai-author.

[2] Brandon E. Hughes, "No Entrance to Legal Paradise: D.C. Court of Appeals Affirms Denial of Copyright Registration for AI-Generated Artwork," accessed September 23, 2025, https://www.msk.com/newsroom-alerts-3089.

[3] Bonfiglio, "Thaler v. Perlmutter."

[4] Shira Perlmutter, *STEPHEN THALER, AN INDIVIDUAL, APPELLANT*, n.d.

[5] "2024 Guidance Update on Patent Subject Matter Eligibility, Including on Artificial Intelligence," Federal Register, July 17, 2024, https://www.federalregister.gov/documents/2024/07/17/2024-15377/2024-guidance-update-on-patent-subject-matter-eligibility-including-on-artificial-intelligence.

[6] "Copyright Registration Guidance: Works Containing Material Generated by Artificial Intelligence," Federal Register, March 16, 2023, https://www.federalregister.gov/documents/2023/03/16/2023-05321/copyright-registration-guidance-works-containing-material-generated-by-artificial-intelligence.

[7] "Article I Section 8 | Constitution Annotated | Congress.Gov | Library of Congress," accessed September 23, 2025, https://constitution.congress.gov/browse/article-1/section-8/.

demonstrates a significant control over its output.[8] Such an interpretation would not create a new definition for authorship but would instead apply existing legal doctrine to an innovation in the modern age. After surveying the relevant U.S. copyright doctrine and analyzing foreign approaches to this issue, this paper will propose a statutory "Human Contribution" test designed to create a clear and workable framework for both courts and Congress to navigate the complexities of authorship in the modern age.[9]

Historical Foundations of Authorship

The constitutional mandate to "promote the Progress of Science and useful Arts" has consistently been interpreted in light of emerging technologies under U.S. copyright law.[10] Courts have construed the Constitution's reference to "Authors" since its inception to mean human creators who exercise judgment and discretion rather than merely mechanical replication.[11] This led to the basis for originality as a requirement for copyright protection.[12]

One of the earliest and influential cases was *Burrow-Giles Lithographic Co. v. Sarony* in 1884. The case began when Napoleon Sarony, a photographer, sued the Burrow-Giles Lithographic Company for reproducing his photograph of author Oscar Wilde without permission. The company's argument was that photographs could not be protected under the copyright law because they were simply mechanical reproductions of reality. The Supreme Court rejected this view, stating that Sarony's creative judgment, such as the lighting, background, and expression imbued the photo with originality, explicitly mentioning that photograph could qualify as a "writing" of an "author" within the meaning of the Copyright Clause..[13] The court hereby confirmed that works that were made with the help of machines could still qualify for copyright protection if authors contributed human intellectual labor.

The logic behind that of *Burrow-Giles Lithographic Co. v. Sarony* was not limited to just photography. Over the following century, both Congress and the courts expanded copyright laws to encompass a number of technological advances. For example, The Copyright Act of 1909 required licensing for mechanical reproductions of musical works, recognizing the part that machines played in producing art.[14] The Act of 1912 explicitly mentioned motion pictures in its list of protected works, despite them being heavily reliant on cameras and editing technologies.[15] Later, in 1980, Congress amended the Copyright Act again to give copyright protection to computer software as literary works, demonstrating that creativity could be expressed as code as well as prose.[16]

---

[8] "Burrow-Giles Lithographic Company v. Sarony, 111 U.S. 53 (1884)," Justia Law, accessed September 23, 2025, https://supreme.justia.com/cases/federal/us/111/53/; "Feist Publications, Inc. v. Rural Tel. Serv. Co., 499 U.S. 340 (1991)," Justia Law, accessed September 23, 2025, https://supreme.justia.com/cases/federal/us/499/340/.
[9] Kateryna Militsyna, "On the Carrot and the Stick That Unfair Competition Law Can Offer to AI-Based Work-Like Output," *GRUR International* 74, no. 9 (2025): 834–44, https://doi.org/10.1093/grurint/ikaf098.
[10] "Article I Section 8 | Constitution Annotated | Congress.Gov | Library of Congress."
[11] "Trademark Cases, 100 U.S. 82 (1879)," Justia Law, accessed September 23, 2025, https://supreme.justia.com/cases/federal/us/100/82/.
[12] Justia Law, "Feist Publications, Inc. v. Rural Tel. Serv. Co., 499 U.S. 340 (1991)."
[13] Justia Law, "Burrow-Giles Lithographic Company v. Sarony, 111 U.S. 53 (1884)."
[14] "Copyright Act of 1909," n.d., accessed September 22, 2025, https://www.copyright.gov/history/1909act.pdf.
[15] "STATUTE-37-Pg488.Pdf," n.d., accessed September 23, 2025, https://www.govinfo.gov/content/pkg/STATUTE-37/pdf/STATUTE-37-Pg488.pdf#page=1.
[16] "The Computer Software Copyright Act of 1980," December 20, 2021, https://www.c2st.org/the-computer-software-copyright-act-of-1980/.

Courts have repeatedly adapted the copyright doctrine to new forms of technology. In *Whelan Associates v. Jaslow Dental Laboratory*, the Third Circuit examined whether a program's overall structure should be included under copyright law.[17] The court stated in its decision that a program's structure, sequence, and organization was considered protectable expression, which is different from the literal source code.[18] This method acknowledged a programmer's creative choices in a program's design. While not visible on the surface, they were just as valuable as the code itself.

Later, in *Computer Associates International, Inc. v. Altai, Inc*., the Second Circuit added on to this analysis and created a stricter framework for software authorship.[19] The court established a three-step "Abstraction-Filtration-Comparison" test to separate protectable expressions from unprotectable ones. In abstraction, a court must first break down the program's code to its core structural components. Second, in filtration, a court must remove all parts that are not protectable by copyright, such as general ideas, elements needed for the program to function, or public domain material. And in comparison, a court will compare the remaining parts of the program to see one was copied from the other.[20] Taken together, these precedents display a consistent ideology; copyright protection has never been limited by the presence of mechanical or technological tools. Instead, it has depended on whether a human exercised creative control and judgment in producing the work. This historical trajectory strongly suggests that the incorporation of artificial intelligence into creative processes should not, by itself, disqualify the works from protection, so long as the human user fulfills the requirement of originality.

Modern Cases

While historical precedent shows copyright law's ability to adapt to new technologies, modern cases demonstrate the doctrinal limits on non-human authorship. *Thaler v. Perlmutter* and *Naruto v. Slater* illustrate different sides of this challenge and highlight the nuanced questions courts face when evaluating works produced by autonomous or partially autonomous agents.

In *Thaler v. Perlmutter*, Dr. Stephen Thaler attempted to register the artificial intelligence system as the sole author and did not emphasize his iterative guidance or selection of outputs.[21] The court's ruling showcases its hesitation to recognize autonomous AI as an author, but it leaves open the question of when meaningful human direction over an AI's creative process might fulfill the copyright law's originality requirement.

The case of *Naruto v. Slater* illustrates a different type of non-human authorship. While *Thaler v. Perlmutter* involved a human attempting to claim authorship for a work created by an autonomous

[17] "Whelan Associates, Inc. v. Jaslow Dental Laboratory, Inc., Dentcom, Inc., Edwardjaslow, Rand Jaslow, and Joseph M. Cerra.Appeal of Jaslow Dental Laboratory, Inc., Edward Jaslow,Rand Jaslow, and Dentcom, Inc, 797 F.2d 1222 (3d Cir. 1986)," Justia Law, accessed September 23, 2025, https://law.justia.com/cases/federal/appellate-courts/F2/797/1222/104748/.
[18] Justia Law, "Whelan Associates, Inc. v. Jaslow Dental Laboratory, Inc., Dentcom, Inc., Edwardjaslow, Rand Jaslow, and Joseph M. Cerra.Appeal of Jaslow Dental Laboratory, Inc., Edward Jaslow,Rand Jaslow, and Dentcom, Inc, 797 F.2d 1222 (3d Cir. 1986)."
[19] "Computer Associates International, Inc. v. Altai, Inc., 982 F.2d 693 (2d Cir. 1992)," Justia Law, accessed September 23, 2025, https://law.justia.com/cases/federal/appellate-courts/F2/982/693/137252/.
[20] "Abstraction-Filtration-Comparison in Software Copyright Litigation," accessed September 23, 2025, https://philip.greenspun.com/software/abstraction-filtration-comparison/.
[21] "DC Circuit Holds That AI Cannot Be an Author Under Copyright Law | Insights & Resources | Goodwin," accessed September 23, 2025, https://www.goodwinlaw.com/en/insights/publications/2025/03/alerts-technology-dc-circuit-holds-that-ai-cannot-be-an-author.

machine, *Naruto v. Slater* directly addressed the question of whether a non-human, an animal, could be an author under the U.S. Copyright Act. The Ninth Circuit's ruling gives us a unique insight into the interpretation of authorship in the doctrine.

The case started a macaque monkey named Naruto, who took a series of selfies using a camera that was set up by a wildlife photographer, David Slater.[22] When the People for the Ethical Treatment of Animals (PETA) filed a lawsuit on Naruto's behalf, they based the case around the legal question of whether an animal could have the legal standing to sue and, by extension, own intellectual property.[23] The Ninth Circuit ultimately ruled that an animal cannot be given authorship as contemplated by the Copyright Act. The court's reasoning was straightforward and hinged on a literal interpretation of the statute, noting that the terms "author" refers to human beings.[24]

While *Thaler v. Perlmutter* and *Naruto v. Slater* both support the idea that authorship can only be given to a human, their doctrinal significance differs. *Thaler v. Perlmutter* displays the gray area of human-AI collaboration, showcasing that courts will look closely at how human input is documented and utilized, whereas *Naruto v. Slater* establishes a clear rule that fully autonomous non-human creators cannot claim authorship. This contrast demonstrates the lack of clear guidance for hybrid human-AI works. Recognizing this gap is crucial for formulating a statutory framework that fosters creativity, balances artificial intelligence, and satisfies the originality requirement.

International Relations

The challenges regarding the nature of authorship are not unique to the United States. Foreign countries have already begun to experiment with many different approaches. A comparative analysis of these approaches can highlight the trade-offs each nation must confront.

In the United Kingdom, the Copyright, Designs, and Patents Act 1988 (CDPA) gives an explicit solution for computer generated works.[25] Under Section 9(3), "the author shall be taken to be the person by whom the arrangements necessary for the creation of the work are undertaken."[26] This provision, although drafted well before the explosive rise of generative AI, creates an explicit statutory framework for giving the human creator authorship. However, this provision has been criticized for its ambiguity in the context of modern artificial intelligence systems.[27]

The European Union has taken a more doctrinal approach. Using case law that mandates a "author's own intellectual creation," the EU's Copyright in the Digital Single Market Directive of 2019 affirmed the idea of human authorship.[28] The European Union has debated whether to create a new, separate class of intellectual property rights for artificial intelligence generated works but has not

[22] "Naruto v. Slater, No. 16-15469 (9th Cir. 2018)," Justia Law, accessed September 23, 2025, https://law.justia.com/cases/federal/appellate-courts/ca9/16-15469/16-15469-2018-04-23.html.
[23] Justia Law, "Naruto v. Slater, No. 16-15469 (9th Cir. 2018)."
[24] "16-15469.Pdf," n.d., accessed September 23, 2025, https://cdn.ca9.uscourts.gov/datastore/opinions/2018/04/23/16-15469.pdf.
[25] Expert Participation, "Copyright, Designs and Patents Act 1988," Text, Statute Law Database, accessed September 23, 2025, https://www.legislation.gov.uk/ukpga/1988/48/contents.
[26] Participation, "Copyright, Designs and Patents Act 1988."
[27] Mark A Lemley, *HOW GENERATIVE AI TURNS COPYRIGHT UPSIDE DOWN*, n.d.
[28] "L_2019130EN.01009201.Xml," accessed September 23, 2025, https://eur-lex.europa.eu/eli/dir/2019/790/oj/eng.

enacted a framework yet. They are reluctant to undermine the human-centered nature of copyright.[29] This approach risks falling behind technological innovation and may prove inadequate to protect a growing body of AI-assisted works.

In contrast, China has been more willing to experiment with AI authorship claims through judicial interpretation.[30] Chinese courts have recognized copyright works generated with the assistance of artificial intelligence systems, provided that there is enough human involvement. This approach, while flexible, allows courts to adapt to technologies without waiting for new legislation. It creates confusion regarding copyright boundaries, as the line between protected and unprotected is drawn on a case-by-case basis.

Comparing these approaches highlights the trade-offs that the United States must confront. The United Kingdom model gives an explicit provision for human authorship, but its vague language creates ambiguity in its application to generative AI.[31] The European Union's model is based upon its doctrine, but this approach might risk falling behind technological advancements. China has a case-by-case model that encourages innovation but may compromise the boundaries of the copyright law.[32] The key lesson for the U.S. policymakers is that clarity is crucial. Any reform should explicitly define AI-assisted works and the required human involvement to qualify as copyrightable.

Human Contribution Test

As artificial intelligence rapidly advances, it is imperative that courts and policymakers must adopt a clear standard to determine when a human can claim authorship over a work created with AI assistance. This paper proposes a statutory "Human Contribution" test, which uses existing historical precedence and doctrine without extending protection to non-human entities like animals. The main principle is that copyright should reward works in which a human exerts meaningful contributions over an AI-generated output. This test does not redefine authorship but explicitly clarifies how traditional principles of originality apply in the current age of artificial intelligence. The Human Contribution test includes three core elements, all of which should be met to satisfy the originality requirement.

First, the person must be able to demonstrate that they exercised creative direction in the completion of the work. This is beyond just typing a single prompt and claiming the result as your own. It needs to include the process of shaping the AI's output. Such direction could involve the use of multiple, detailed, and specific prompts, the strategic selection and combination of multiple AI-generated outputs, or a process of guiding the AI through successive refinements. This element ensures that the human is not just a passive recipient of the work but is actively using the AI as a tool to achieve a specific creative vision.

---

[29] Nicola Lucchi, *Generative AI and Copyright*, n.d.
[30] "Tencent Co., Ltd. v. Shanghai Yinxun Technology Co., Ltd 2018 Copyright Infringement Lawsuit," Flatfee, accessed September 23, 2025, https://flatfeecorp.com/articles/tencent-versus-shanghai-yinxun-technology-2018-copyright-infringement-case-china.
[31] Authors Alliance, "The UK's Curious Case of Copyright for AI-Generated Works: What Section 9(3) Means Today," *Authors Alliance*, May 19, 2025, https://www.authorsalliance.org/2025/05/19/the-uks-curious-case-of-copyright-for-ai-generated-works-what-section-93-means-today/.
[32] Anthi Gaidartzi and Irini Stamatoudi, "Authorship and Ownership Issues Raised by AI-Generated Works: A Comparative Analysis," *Laws* 14, no. 4 (2025): 57, https://doi.org/10.3390/laws14040057.

Second, the person's contribution should be at a level that shapes the elements of the artificially generated work. This element is the heart of the test and directly aligns with the "modicum of creativity" standard established in *Feist Publications, Inc. v. Rural Telephone Service Co.* While the AI may perform the mechanical execution of the work, the human must have made intellectual choices that imbue the final product with originality. For example, a photographer's creative choices regarding lighting and composition were sufficient for authorship in *Burrow-Giles Lithographic Co. v. Sarony*. A human's creative decisions in designing, arranging, or manipulating the AI-generated content can fulfill the intellectual contribution requirement. This element distinguishes a mere mechanical output from a work guided by human judgment.

Lastly, the person must be able to demonstrate that they made this work on purpose. This can be accomplished by recording the actual creative process. As opposed to when the AI is merely producing content without human guidance, it guarantees that authorship is only granted when human creativity is actively guiding the AI.

Conclusion

While copyright law has historically expanded to include technological advancements, as demonstrated in cases like *Burrow-Giles Lithographic Co. v. Sarony*, modern challenges from AI-generated works, accentuated by *Naruto v. Slater* and *Thaler v. Perlmutter*, highlight the current legal gaps that exist in our doctrine.[33] There is no explicit standard for when human-AI collaborations satisfy the originality requirement. This uncertainty risks inconsistent rulings and discourages the responsible use of artificial intelligence in a creative process.

Comparing international approaches show that similar issues are starting to be addressed in most AI related industries. China takes a flexible, case-by-case approach, the European Union emphasizes a human authorship system following doctrine, while the United Kingdom offers statutory direction through its CDPA provision.[34] These approaches demonstrate that a solution would be to strike a balance between technological innovation and the fundamental values of copyright law.

The Human Contribution test proposed in this paper offers a practical solution. By requiring meaningful human creative judgment and intentional authorship the test preserves the human-centric nature of copyright law while ensuring an explicit framework for courts and policymakers. By clarifying the boundaries of authorship in AI-assisted works, the law can continue to incentivize human creativity, accommodate the realities of AI-assisted production, and fulfill copyright's constitutional purpose to promote the progress of science and useful arts by rewarding genuine human innovation. [35]

[33] Justia Law, "Burrow-Giles Lithographic Company v. Sarony, 111 U.S. 53 (1884)"; Justia Law, "Naruto v. Slater, No. 16-15469 (9th Cir. 2018)"; Perlmutter, *STEPHEN THALER, AN INDIVIDUAL, APPELLANT*.
[34] Gaidartzi and Stamatoudi, "Authorship and Ownership Issues Raised by AI-Generated Works"; Flatfee, "Tencent Co., Ltd. v. Shanghai Yinxun Technology Co., Ltd 2018 Copyright Infringement Lawsuit."
[35] "Article I Section 8 | Constitution Annotated | Congress.Gov | Library of Congress."

References

Gaidartzi, Anthi and Irini Stamatoudi. "Authorship and Ownership Issues Raised by AI-Generated Works: A Comparative Analysis." *Laws* 14, no. 4 (2025): 57. https://doi.org/10.3390/laws14040057.

Authors Alliance. "The UK's Curious Case of Copyright for AI-Generated Works: What Section 9(3) Means Today." May 19, 2025. https://www.authorsalliance.org/2025/05/19/the-uks-curious-case-of-copyright-for-ai-generated-works-what-section-93-means-today/.

Bonfiglio. "Thaler v. Perlmutter."
Burrow-Giles Lithographic Co. v. Sarony, 111 U.S. 53 (1884).
"Burrow-Giles Lithographic Company v. Sarony, 111 U.S. 53 (1884)." *Justia Law*. Accessed September 23, 2025. https://supreme.justia.com/cases/federal/us/111/53/.

Computer Associates International, Inc. v. Altai, Inc., 982 F.2d 693 (2d Cir. 1992).
"Computer Associates International, Inc. v. Altai, Inc., 982 F.2d 693 (2d Cir. 1992)." *Justia Law*. Accessed September 23, 2025. https://law.justia.com/cases/federal/appellate-courts/F2/982/693/137252/.

Copyright Act of 1909. https://www.copyright.gov/history/1909act.pdf.

Copyright, Designs and Patents Act 1988, c. 48 (UK). https://www.legislation.gov.uk/ukpga/1988/48/contents.

Directive (EU) 2019/790 of the European Parliament and of the Council of 17 April 2019 on Copyright and Related Rights in the Digital Single Market. https://eur-lex.europa.eu/eli/dir/2019/790/oj/eng.

Federal Register. "2024 Guidance Update on Patent Subject Matter Eligibility, Including on Artificial Intelligence." July 17, 2024. https://www.federalregister.gov/documents/2024/07/17/2024-15377/2024-guidance-update-on-patent-subject-matter-eligibility-including-on-artificial-intelligence.

Federal Register. "Copyright Registration Guidance: Works Containing Material Generated by Artificial Intelligence." March 16, 2023. https://www.federalregister.gov/documents/2023/03/16/2023-05321/copyright-registration-guidance-works-containing-material-generated-by-artificial-intelligence.

Feist Publications, Inc. v. Rural Telephone Service Co., 499 U.S. 340 (1991).

Flatfee. "Tencent Co., Ltd. v. Shanghai Yinxun Technology Co., Ltd 2018 Copyright Infringement Lawsuit." Accessed September 23, 2025. https://flatfeecorp.com/articles/tencent-versus-shanghai-yinxun-technology-2018-copyright-infringement-case-china.

Goodwin. "DC Circuit Holds That AI Cannot Be an Author Under Copyright Law." Accessed September 23, 2025. https://www.goodwinlaw.com/en/insights/publications/2025/03/alerts-technology-dc-circuit-holds-that-ai-cannot-be-an-author.

Hughes, Brandon E. "No Entrance to Legal Paradise: D.C. Court of Appeals Affirms Denial of Copyright Registration for AI-Generated Artwork." Accessed September 23, 2025. https://www.msk.com/newsroom-alerts-3089.

Lemley, Mark A. *How Generative AI Turns Copyright Upside Down.*

Lucchi, Nicola. *Generative AI and Copyright.*

Militsyna, Kateryna. "On the Carrot and the Stick That Unfair Competition Law Can Offer to AI-Based Work-Like Output." *GRUR International* 74, no. 9 (2025): 834–844. https://doi.org/10.1093/grurint/ikaf098.

Naruto v. Slater, 888 F.3d 418 (9th Cir. 2018).
"Naruto v. Slater, No. 16-15469 (9th Cir. 2018)." *Justia Law*. Accessed September 23, 2025. https://law.justia.com/cases/federal/appellate-courts/ca9/16-15469/16-15469-2018-04-23.html.

Norton Rose Fulbright. "US Court of Appeals for DC Denies Copyright Registration for Work Generated Solely by AI Author." Accessed September 23, 2025. https://www.nortonrosefulbright.com/en/knowledge/publications/bfc31103/us-court-of-appeals-for-dc-denies-copyright-registration-for-work-generated-solely-by-ai-author.

Participation, Expert. "Copyright, Designs and Patents Act 1988." Statute Law Database. Accessed September 23, 2025. https://www.legislation.gov.uk/ukpga/1988/48/contents.

Perlmutter, Shira. *Stephen Thaler, an Individual, Appellant.*
The Computer Software Copyright Act of 1980. December 20, 2021. https://www.c2st.org/the-computer-software-copyright-act-of-1980/.

"Trademark Cases, 100 U.S. 82 (1879)." *Justia Law*. Accessed September 23, 2025. https://supreme.justia.com/cases/federal/us/100/82/.

U.S. Constitution Annotated. "Article I, Section 8." Library of Congress. Accessed September 23, 2025. https://constitution.congress.gov/browse/article-1/section-8/.

Whelan Associates, Inc. v. Jaslow Dental Laboratory, Inc., 797 F.2d 1222 (3d Cir. 1986).