

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

IN RE:

OPENAI, INC.

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This Document Relates To:
All Matters

2:25-md-3143 (SHS) (OTW)

**MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

PLEASE TAKE NOTICE that upon the annexed Declaration of John F. Bash dated October 27, 2026 and the Certificate of Good Standing annexed thereto, *amici curiae* Former United States Senator Rick Santorum and Former United States Representative Rick Boucher hereby moves through its undersigned counsel for an Order pursuant to Rule 1.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, admitting John F. Bash for admission to practice *pro hac vice*, in the above captioned action and for such other and further relief the Court deems just and equitable.

John F. Bash is a member in good standing of the Bars of Texas, and Washington, D.C. He has never been convicted of a felony and there are no pending disciplinary proceedings against me in any federal or state court. He has never been censured, suspended, disbarred or denied admission or readmission by any court.

Respectfully Submitted,

**QUINN EMANUAL URQUHART
& SULLIVAN, LLP**

Dated: October 27, 2026

By: /s/ John F. Bash
John F. Bash
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*Attorney for Rick Santorum and Rick
Boucher*