



October 15, 2026

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VIA ECF

Hon. Sidney H. Stein
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

RE: *In re: OpenAI, Inc. Copyright Infringement Litigation*, No. 1:25-md-03143 (SHS) (OTW); this document relates to Nos. 1:23-cv-11195, 1:24-cv-01515, 1:24-cv-03285 1:24-cv-04872, 1:25-cv-00501

Dear Judge Stein:

In light of Defendants' decision to withdraw their sealing requests for certain information from News Plaintiffs' opening summary judgment motion, *see* ECF Nos. 2094 and 2096, News Plaintiffs withdraw their challenge to Defendants' remaining sealing requests except for the passages that appear on pages 9 and 67, which Microsoft seeks to keep sealed. News Plaintiffs do not believe that additional argument regarding these passages is necessary to show they should not be sealed, *see* ECF No. 2083, but would be happy to respond to Microsoft's most recent arguments if the Court prefers. Additionally, News Plaintiffs plan to file an updated version of their brief that removes the redactions that Defendants no longer assert by Friday, October 16. News Plaintiffs continue to reserve their rights to challenge proposed sealings to 56.1 statements and exhibits at a later date.

Dated: October 15, 2026

/s/ Matthew Topic

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cc: All Counsel of Record (via ECF)

