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December 29, 2025

Re: *In re OpenAI Inc., Copyright Infringement Litigation*, 25-md-3143
This Document Relates to: All Actions

Dear Magistrate Judge Wang:

I write on behalf of Plaintiffs The New York Times Company ("The Times"), Daily News, LP, et al. ("*Daily News* Plaintiffs"), and The Center for Investigative Reporting ("CIR") (collectively, "News Plaintiffs") in response to the Court's December 19, 2025 order. That order addressed OpenAI's request to seal material submitted with the parties' May 2025 briefing on their dispute over OpenAI's preservation of output log data. Dkt. 989.

This Court directed the parties to "file their May 2025 supplemental briefs and exhibits in accordance with the Court's December 8 order [Dkt. 318] granting OpenAI's motion to seal." Dkt. 989 at 9. Attached to this letter are partially unredacted copies of News Plaintiffs' May 16, 2025 Supplemental Memorandum of Law Regarding OpenAI's Deletion of Output Log Data.

Sincerely,

/s/ Davida Brook
Davida Brook