UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION This Document Relates To: News Cases	25-md-3143 (SHS) (OTW) **NEWS PLAINTIFFS' MOTION TO FILE UNDER SEAL**

Under paragraph 34 of the Stipulated Protective Order (Dkt. 367), News Plaintiffs respectfully seek to provisionally file under seal portions of their discovery motions being filed today. These motions are: (1) motion to compel Microsoft to provide discovery relating to GPT-4o and GPT-4o Mini; (2) motion to compel additional deposition hours for OpenAI witnesses, (3) motion to compel OpenAI to produce certain documents; (4) motion to compel OpenAI to search certain Azure containers; and (5) motion concerning OpenAI's violation of the Court's orders governing OpenAI's production of output logs. These discovery motions cite and attach information and documents that have been designated as Protected Discovery Material by Defendants.

News Plaintiffs do not affirmatively seek to seal any material. Under the Protective Order, Defendants have five business days to file a statement of reasons for why the material should be sealed. News Plaintiffs will review these filings, and if necessary, confer about any disagreement.

Dated: January 5, 2026

/s/ Davida Brook

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