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January 8, 2026

***VIA ECF***

Hon. Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *In re OpenAI, Inc., Copyright Infringement Litigation*, 25-md-3143 (SHS) (OTW)
This Document Relates To: News Cases

Dear Magistrate Judge Wang:

OpenAI and the News Plaintiffs write to update the Court on the status of the discovery dispute briefed at ECF 1034 regarding OpenAI's production of user engagement metrics. Based on representations from OpenAI regarding the status of its production, the parties believe that they have resolved News Plaintiffs' letter motion and thus do not believe this issue needs to be heard at the January 15, 2026, discovery conference. News Plaintiffs reserve all rights to re-raise this issue if necessary.

Respectfully,

*/s/ Edward A. Bayley*
Edward A. Bayley[1]
Keker, Van Nest & Peters LLP
*Counsel for OpenAI Defendants*

*/s/ Davida Brook*
Davida Brook
Susman Godfrey LLP
*News Plaintiffs' Liaison Counsel*

cc: *All Counsel of Record (via ECF)*

[1] All parties whose electronic signatures are included herein have consented to the filing of this document.