January 9, 2026

VIA ECF

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

RE: *In re OpenAI, Inc. Copyright Infringement Litigation* (No. 1:25-md-03143) This document relates to All Cases.

Dear Magistrate Judge Wang:

Per the Court's Order at ECF 910, please find attached, on behalf of all parties, three charts that contain summaries of the discovery disputes that are the subject of pending motions as well as updates regarding the parties' previous discovery disputes. Exhibit A contains a chart summarizing the discovery disputes in both the News and Class Cases. Exhibit B contains a chart summarizing discovery disputes in the News Cases. Exhibit C contains a chart summarizing the discovery disputes in the Class Cases.

Sincerely,

/s Justin A. Nelson
Justin Nelson
Susman Godfrey LLP
Interim Lead Class Counsel

/s/ Davida Brook
Davida Brook
Susman Godfrey LLP
Counsel for The New York Times Company
News Plaintiffs' Liaison Counsel

cc: All Counsel of Record (via ECF)